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NOTE

From:	Presidency
To:	Working Party on Statistics
Subject:	Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing a common framework for European statistics relating to persons and households, based on data at individual level collected from samples

Delegations will find attached the outcome of the Slovak Presidency written consultation on the above Regulation.

Slovak Presidency written consultation on the proposal for a Regulation of the European Parliament and of the Council establishing a common framework for European statistics relating to persons and households, based on data at individual level collected from samples

General comments:

The vast majority of Member States supports the objective of streamlining and modernising the production of European social statistics relating to persons and households, based on data at individual level collected from samples. The new approach - the framework regulation which puts together under one legal act all domain-specific data collections, which harmonises definitions and other cross-cutting elements, makes data collection more efficient and guarantees the flexibility in order to respond efficiently to the increasing demands of users.

Even though Member States, in general, support the idea of integrating of the parts of the European social statistics as presented by the Commission, they expressed their concerns on some aspects of the proposal. The most frequent comments, suggestions and requests for clarification refer to the following matters:

- the legal architecture of the regulation: use of delegated and implementing acts, procedural aspects, insufficient safeguard clauses,
- the inclusion of the time use and consumption domains,
- the inclusion of elements of input harmonisation,
- the six-years rotation scheme in SILC,
- the obligatory participation of Member States in the feasibility and/or pilot studies,
- the financial support provided by the Commission,
- the cost and burden: long-run savings vs. additional cost and burden due to implementation of the new or modified requirements.

In addition, some Member States expressed their views that General Data Protection Regulation (EU) 2016/679, which repeals Directive 95/46/EC with effect from 25 May 2018, should be taken into account within the negotiation process. Also the opinion of the Data Protection Supervisor has been required.

The comments provided by the Member States should be treated as preliminary. Most Member States reserve the right to provide further comments and/or to modify their position during the course of the negotiations.

Three Member States informed the Presidency on their intention to apply for the derogations in some areas.

COM proposal	MSs' proposals for wording	MSs' comments and justification
<p>THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,</p> <p>Having regard to the Treaty on the Functioning of the European Union, and in particular Article 338(1) thereof,</p> <p>Having regard to the proposal from the European Commission,</p> <p>After transmission of the draft legislative act to the national parliaments,</p> <p>Acting in accordance with the ordinary legislative procedure,</p>		
<p>Whereas:</p>		
<p>(1) In the context of the Europe 2020 Strategy¹ and the strengthening of economic governance, social indicators play an essential role in informing and supporting the Union's key priorities for growth and job creation, the reduction of poverty and social exclusion, skills, mobility and the digital economy. In particular, social indicators must provide a sound statistical basis for developing and monitoring the policies introduced by the Union to address those priorities.</p>	<p>(1) In the context of the Europe 2020 Strategy¹ and the strengthening of economic governance, social indicators play an essential role in informing and supporting the Union's key priorities for growth and job creation, the reduction of poverty and social exclusion, skills, mobility and the digital economy. In particular, social indicators must should provide a sound statistical basis for developing and monitoring the policies introduced by the Union to address those priorities.</p>	

¹ Communication from the Commission - EUROPE 2020 A strategy for smart, sustainable and inclusive growth COM (2010) 2020 of 3 March 2010.

	<p><u>Alternative proposal:</u> To delete the last sentence.</p>	
<p>(2) In view of this, social indicators should be of the necessary high quality, in particular in terms of their robustness, their timeliness, their relevance, their adaptability to new users' requests, as well as their comparability and efficiency.</p>	<p>(2) In view of this, social indicators should be of the necessary high quality, in particular in terms of their robustness accuracy, their timeliness, their relevance, their adaptability to new users' requests, as well as their comparability and efficiency.</p> <p><u>Alternative proposal:</u></p> <p>(2) Therefore In view of this, social indicators of should be of the necessary high quality, in particular in terms of their robustness, their timeliness, their relevance, their adaptability to new users' requests, and of high as well as their comparability and efficiency are essential crucial for developing and monitoring the policies introduced by the Union to address those priorities.</p>	<p>The quality standards must refer to the criteria laid down in Regulation (EC) No 223/2009: Proposal for revised wording: “in particular relevance, accuracy, timeliness, punctuality, accessibility and clarity, comparability and coherence”. Efficiency is not a quality criterion and should not be mentioned in this context. The term “robustness” must be avoided as it is not clearly defined with regard to quality of statistics.</p> <p>There are no corresponding articles in the proposal about the production of European social indicators or European Social Statistics, therefore there are no corresponding articles about their quality. It is proposed that either this recital is deleted or proposal for Article 10a is adopted.</p>

		A new recital 2a referring to the importance of social indicators for the monitoring of the sustainable development goals might also be appropriate.
<p>(3) European statistics relating to persons and households are currently collected on the basis of a number of legislative acts covering surveys on persons and households, demographic statistics, population and housing censuses and statistics mainly collected from administrative sources. Some data are also gathered from business surveys. Despite significant improvements in recent years there is a need to further integrate the collection of statistics based on surveys conducted on persons and households.</p>	<p>(3) European statistics relating to persons and households are currently compiled collected on the basis of a number of legislative acts covering sample surveys on persons and households, demographic statistics, population and housing censuses and data statistics—mainly collected from administrative sources. Some data are also gathered from business surveys. Despite significant improvements in recent years there is a need to further integrate the collection of statistics based on sample surveys conducted on persons and households.</p> <p><u>Alternative proposal for the last sentence:</u> Despite—Further to the significant improvements the harmonisation of European Social Statistics in recent years there is a need to further integrate the collection of data statistics based on surveys conducted on persons and households from on these sources to minimise the duplication of topics across domains.</p>	

<p>(4) The possibility to use administrative sources for statistical purposes has widened significantly, thanks to technological advances. The use of administrative sources should be actively promoted in the area of social statistics, while always ensuring the quality, accuracy, timeliness and comparability of those statistics.</p>	<p>(4) The possibility to use administrative sources for statistical purposes, as foreseen in Regulation (EC) No 223/2009, has widened significantly, thanks to technological advances. The use of administrative sources should be actively promoted in the area of social statistics, while always ensuring the quality, accuracy, timeliness and comparability of those statistics.</p>	<p>Accuracy, timeliness and punctuality are all components of quality (see quality criteria in article 12 of Regulation (EC) No 223/2009 on European statistics).</p>
<p>(5) The Communication from the Commission to the European Parliament and the Council on the Production Method of EU Statistics: a Vision for the Next Decade² emphasised the increasing use of multiple data sources and innovative data collection methods as well as the growing importance of harmonising statistical concepts and methods across domains. It called for a new generation of statistical legislation that would address broader areas.</p>	<p>(5) The Communication from the Commission to the European Parliament and the Council on the Production Method of EU Statistics: a Vision for the Next Decade² emphasised the increasing use of multiple data sources and innovative data collection methods as well as the growing importance of harmonising statistical concepts and methods across domains, calling also. It called for a new generation of statistical legislation that would address broader areas.</p>	<p>A reference to ESS Vision 2020 instead. An alternative could be to delete this point.</p>

² COM (2009) 404 of 10.8.2009.

	(5a) The European Statistical System (ESS) Committee as consequently agreed on the ESS Vision 2020 as the guiding frame for the ESS development during the years up to 2020.	
(6) In 2011, the European Statistical System (ESS) endorsed in Wiesbaden its Memorandum on a New Conceptual Design for Household and Social Statistics. In its view, the European surveys that provide data relating to persons and households should be streamlined, and additional, less frequent microdata collections should be used to complement those core social surveys. Furthermore, there should be better access to administrative data, and the re-use of existing data sources and access to new data sources should be developed at national and EU level.	(6) In 2011, the European Statistical System (ESS) endorsed the in —Wiesbaden— its Memorandum on a New Conceptual Design for Household and Social Statistics, which emphasized that according to which In its view, the European surveys that provide data relating to persons and households should be streamlined, and additional, less frequent microdata collections should be used to complement those core social surveys. Furthermore, there should be better access to administrative data should be enhanced and the re-use of existing data sources should be enhanced and the access to new data sources should be developed at national and EU level.	
(7) The developments described above need to be gradually streamlined, and statistical legislation in the area of social statistics needs to be modernised, in order to ensure that the high quality social indicators are produced in a more integrated, flexible and efficient manner. At the same time, due consideration must be given to the needs of users, to the burden placed on respondents, to Member States resources,	(7) The developments described above need to be gradually streamlined, and statistical legislation in the area of social statistics needs to be modernised, in order to ensure that the high quality social indicators are produced in a more integrated, flexible and efficient manner. At the same time, due consideration must be given to the needs of users, to the burden placed on respondents, to Member States resources, the reliability	

<p>the reliability and accuracy of the methods used, technical feasibility of producing the statistics, the time within which they can be available and the reliability of the results.</p>	<p>and accuracy of the methods used, technical feasibility of producing the statistics, the time within which they can be available and the reliability of the results.</p>	<p>There are no corresponding articles for the production of high quality indicators, or for the timeliness and reliability of statistical results. It is proposed either to delete this recital, or to include proposed Article 10a.</p>
<p>(8) This Regulation sets up a framework for European statistics relating to persons and households based on data at individual level collected from samples. It specifies the data and information to be collected and submitted by Member States, and includes the fundamental quality requirements to be met by the data. It provides for more detailed technical specifications to be given in delegated acts and implementing measures. It allows the various data collections to be integrated with one another and with the use of administrative data, while consolidating and simplifying existing legislation.</p>	<p>(8) This Regulation sets up a framework for European statistics relating to persons and households based on data at individual level collected from samples. It specifies the data and information to be collected and submitted transmitted, the European social indicators and the European Social Statistics to be produced by the Commission (Eurostat) and the Member States respectively, and includes—the fundamental quality requirements to be met by the data. It provides for more detailed technical specifications to be given in delegated acts and implementing measures. It allows the various data collections to be integrated with one another and with the use of administrative data, while consolidating and simplifying existing legislation.</p> <p><u>Alternative proposal:</u> To delete the whole third sentence.</p>	<p>This recital does not mention the production of the indicators/statistics as being part of the framework.</p>

<p>(9) In order to better streamline and rationalise the reference framework for European social statistics collected from samples, existing European statistics on persons and households based on data at individual level should be brought together under one framework. This would guarantee that European social statistics collected from samples including the domains of labour market, income and living conditions, health, education and training and use of information and communication technologies would be undertaken in a consistent, coherent and coordinated way.</p>	<p>(9) In order to better streamline and rationalise the reference framework for European social statistics collectedderived from sample surveys including the domains of labour market, income and living conditions, health, education and training and use of information and communication technologies are currently regulated in a number of different legislative acts.Therefore, existing European statistics on persons and households based on data at individual level should be brought together under one framework, thus ensuring that these statistics are. The expertise and experience in Member States should be used to ensure comparability of social indicators at the European level. This would guarantee that the above statistics European social statistics collected from samples including the domains of labour market, income and living conditions, health, education and training and use of information and communication technologies would be undertakenproduced in a consistent, coherent and coordinated way.</p>	<p>There is no guarantee that input harmonisation will deliver harmonised output. Surveys and survey questions must reflect the national context in order to produce comparable results. It will often be the case that differences in input are needed to secure harmonised output.</p>
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<p>(10) Data collections in the domains of time use and consumption are currently carried out voluntarily by many Member States, on the basis of agreed general guidelines. These two domains should be modernised, so as to take full advantage of new technological advances. Data collections in these two domains should be organized in accordance with this Regulation so as to open possibilities and create opportunities for further developments in the future, ensuring data that are more timely and relevant, and produced more efficiently. In the meantime, the Member States' current approaches should not be changed.</p>	<p>(10) Data collections in the domains of time use and consumption are currently carried out voluntarily by many Member States, on the basis of agreed general guidelines. These two domains should be modernised, so as to take full advantage of new technological advances. Data collections in these two domains should be organized in accordance with this Regulation so as to open possibilities and create opportunities for further developments in the future, ensuring data that are more timely and relevant, comparable across Member States, and produced more efficiently. In the meantime, the Member States' current approaches should not be changed.</p> <p><u>Alternative proposal 1:</u> 2 MSs propose to remove reference to TUS.</p>	<p>Time Use Survey is currently implemented as part of official statistics only in a subset of Member States. We recognize the research potential of this topic, however given the high costs and capacity requirements of a full-scale diary based TUS and the proposed minimum sample sizes, its inclusion under the IESS regulation as compulsory data collection for all Member States needs in our view careful assessment and cost-benefit analysis. Also, the combination with the foreseen postponement of coverage of this domain to 2025 with foreseen first implementation in 2030 makes the informed commitment to conduct survey in this domain complicated, since the important factors related to priority settings in the official statistics and</p>
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		<p>policy areas and technological development in statistics and information gathering techniques are difficult to predict. Against this background, we suggest for consideration the option of dropping this domain from the current regulation proposal, and re-visiting this issue in due time after 2025 with a view towards foreseen EU-wide TUS in 2030.</p> <p>Alternative proposal 2: 3 MSs propose to remove reference to TUS and HBS.</p> <p>The inclusion of TUS and HBS surveys in this regulation is opposed, since this would mean a significant increase in the overall costs and response burden. Furthermore it does not make sense to include them in this regulation as we do not even know if they would be conducted as surveys when implemented in 2025.</p> <p>Time Use Survey and Household Budget Survey can be conducted on the basis of an informal agreement.</p>
(11) Due to their specificities, demographic statistics ³ , population and housing censuses ⁴ , business surveys and statistics based on mainly administrative sources are not covered by this Regulation and should be governed separately by specific frameworks adapted to their characteristics.		
(12) Statistics are no longer considered as just one of many sources of information for	(12) Statistics are no longer considered as just one of many sources of information for	

³ Regulation (EU) No 1260/2013 of the European Parliament and of the Council of 20 November 2013 on European demographic statistics (OJ L 330, 10.12.2013, p.39).

⁴ Regulation (EC) No 763/2008 of the European Parliament and of the Council of 9 July 2008 on population and housing censuses (OJ L 218, 13.8.2008, p. 14).

<p>policy-making purposes, but instead play a central role in the decision-making process. Evidence-based decision-making requires statistics that meet high-quality criteria, as set out in Regulation (EC) No 223/2009 of the European Parliament and of the Council⁵, in accordance with the purposes they are serving.</p>	<p>policy-making purposes, but instead play a central role in the decision-making process. Evidence-based decision-making requires statistics that meet high-quality criteria, as set out in Regulation (EC) No 223/2009 of the European Parliament and of the Council⁵ as amended by Regulation (EU) No 2015/759, in accordance with the purposes they are serving.</p>	
<p>(13) High quality social data are not only necessary for policy purposes but also for research and as a component of sound information infrastructure. Researchers acquiring access to microdata for scientific purposes, granted on the basis of Commission Regulation (EU) No 557/2013⁶ on European Statistics as regards access to confidential data for scientific purposes, would benefit greatly from having better linked statistical datasets, which would in turn enhance policy impact assessment studies.</p>	<p>(13) High quality social data are not only necessary for policy purposes but also for research and as a component of sound information infrastructure. Researchers acquiring access to microdata for scientific purposes, granted on the basis of Commission Regulation (EU) No 557/2013⁶ on European Statistics as regards access to confidential data for scientific purposes, would benefit greatly from having better linked statistical datasets, which would in turn enhance policy impact assessment studies.</p>	<p>This sentence is confused because it seems that confidential data are going to be used to deliver policy impact assessment, which is against the principle of statistical confidentiality.</p>

⁵ Regulation (EC) No 223/2009 of the European Parliament and of the Council of 11 March 2009 on European statistics and repealing Regulation (EC, Euratom) No 1101/2008 of the European Parliament and of the Council on the transmission of data subject to statistical confidentiality to the Statistical Office of the European Communities, Council Regulation (EC) No 322/97 on Community Statistics, and Council Decision 89/382/EEC, Euratom establishing a Committee on the Statistical Programmes of the European Communities (OJ L 87, 31.3.2009, p. 164).

⁶ Commission Regulation (EU) No 557/2013 of 17 June 2013 implementing Regulation (EC) No 223/2009 of the European Parliament and of the Council on European Statistics as regards access to confidential data for scientific purposes and repealing Commission Regulation (EC) No 831/2002

<p>(14) Regulation (EC) No 223/2009 provides a reference framework for European statistics and requires Member States to comply with the statistical principles and quality criteria specified in the Regulation. Quality reports are essential for assessing, improving and communicating on the quality of European statistics. The European Statistical System Committee (ESSC) has endorsed an ESS Standard for Quality Reports Structure, in accordance with Article 12 of Regulation (EC) No 223/2009. This should contribute to the harmonisation of quality reporting under this Regulation.</p>	<p>(14) Regulation (EC) No 223/2009 provides a reference framework for European statistics and requires Member States to comply with the statistical principles and quality criteria specified in the Regulation. Quality reports are essential for assessing, improving and communicating on the quality of European statistics. The European Statistical System Committee (ESSC) has endorsed an ESS Standard for Quality Reports Structure, in accordance with Article 12 of Regulation (EC) No 223/2009. This should contribute to the harmonisation of quality reporting under this Regulation.</p>	<p>There is no need to make such specific reference to quality reporting here.</p>
<p>(15) Regulation (EC) No 223/2009 includes rules on the transmission of data from the Member States, including the transmission of confidential data. Measures taken in accordance with this Regulation should ensure that confidential data is protected and that no unlawful disclosure or non-statistical use of data occurs during the production and dissemination of European statistics.</p>	<p>(15) Regulation (EC) No 223/2009 includes rules on the transmission of data from the Member States, including the transmission of confidential data. Measures taken in accordance with this Regulation should ensure that confidential data is protected and that no unlawful disclosure or non-statistical use of data occurs during the production and dissemination of European statistics. are exclusively used for statistical purposes and to prevent their unlawful disclosure.</p>	<p>Wording Reg. (EC) No 223/2009 to be used.</p>

		Recital (20) should be inserted here after recital (15). These two recitals make reference to the legal frame covering the data covered under this Regulation
(16) Statistics are needed at national and at regional level as well. In accordance with Regulation (EC) No 1059/2003 ⁷ , all Member States' statistics that are transmitted to the Commission and that are to be broken down by territorial units should use the NUTS classification. Consequently, in order to establish comparable regional statistics, data on the territorial units should be provided in accordance with the NUTS classification.	(16) Statistics are needed at national and at regional level as well. In accordance with Regulation (EC) No 1059/2003 ⁷ , all Member States' statistics that are transmitted to the Commission and that are to be broken down by territorial units should use the NUTS classification. Consequently, in order to— establish to ensure the—comparable regional European Social statistics produced by Member States are comparable, enabling the Commission to produce European indicators of the highest quality , data on the territorial units should be provided—collected in accordance with the NUTS classification.	There are no corresponding articles about the production of statistics by Member States and their transmission to the Commission. <u>1 MS proposes</u> that an article on the production of statistics by Member States and their transmission to the Commission for their production of European indicators is included in order to deliver this policy intention. As drafted, the last sentence does not state who is to produce the regional statistics, and it should be made clear that production will respect subsidiarity.
(17) In order to take account of economic, social and technical developments, the power to adopt acts in accordance with Article 290 of the Treaty on the Functioning of the European Union should be delegated to the Commission in respect of the detailed topics set out in Annex I. The Commission should also have the power to put in place or adapt the eight-year multiannual rolling planning for the	(17) In order to take account of economic, social and technical developments, the power to adopt acts in accordance with Article 290 of the Treaty on the Functioning of the European Union should be delegated to the Commission in respect of amending the detailed topics set out in Annex I. and the establishment or adaptation of. — The Commission should also have the power to put in place or adapt the an eight-year	

⁷ Regulation (EC) No 1059/2003 of the European Parliament and of the Council of 26 May 2003 on the establishment of a common classification of territorial units for statistics (NUTS) (OJ L 154, 21.6.2003, p. 1).

<p>collection of data covered by this Regulation in accordance with the periodicity specified in Annex IV. It is of particular importance that the Commission carry out appropriate consultations during its preparatory work, including at expert level, and that those consultations are conducted in accordance with the principles laid down in the Interinstitutional Agreement on Better Law-Making of 13 April 2016. In particular, to ensure equal participation in the preparation of delegated acts, the European Parliament and the Council receive all documents at the same time as Member States' experts, and their experts systematically have access to meetings of Commission expert groups dealing with the preparation of delegated acts.</p>	<p>multiannual rolling planning for the collection of data covered by this Regulation in accordance with the periodicity and first year of implementation specified in Annex IV. It is of particular importance that the Commission carry out appropriate consultations during its preparatory work, including at expert level, and that those consultations are conducted in accordance with the principles laid down in the Interinstitutional Agreement on Better Law-Making of 13 April 2016. In particular, to ensure equal participation in the preparation of delegated acts, the European Parliament and the Council receive all documents at the same time as Member States' experts, and their experts systematically have access to meetings of Commission expert groups dealing with the preparation of delegated acts.</p> <p><u>Alternative proposal:</u> To remove reference to delegated acts.</p>	<p>The use of delegated acts to amend the multi-annual rolling program is opposed. This has the potential to increase cost and burden.</p> <p>This whereas shall be amended taking into account the final agreement on the Legal Architecture of the proposal, in particular on Articles 3(4) and 4(1).</p>
<p>(18) In order to ensure uniform conditions for the implementation of this Regulation,</p>	<p>(18) In order to ensure uniform conditions for the implementation of this Regulation,</p>	<p>This whereas shall be amended taking into account the final agreement on the Legal</p>

<p>implementing powers should be conferred on the Commission in respect of the technical specifications of the particular data sets, the technical items when they are common to several data sets, the technical standards needed to facilitate the exchange and sharing of information between the Commission (Eurostat) and the Member States, the sampling frames, notably setting out their minimum requirements, the modalities and content of the quality reports, and in respect of any derogations. Those powers should be exercised in accordance with Regulation (EU) No 182/2011⁸.</p>	<p>implementing powers should be conferred on the Commission in respect of the technical specifications of the particular data sets, the technical items when they are common to several data sets, the technical standards needed to facilitate the exchange and sharing of information between the Commission (Eurostat) and the Member States, the sampling frames, notably setting out their minimum requirements, the modalities and content of the quality reports, and the granting of in respect of any derogations. Those powers should be exercised in accordance with Regulation (EU) No 182/2011⁸.</p>	<p>Architecture of the proposal, in particular on Articles 3(4) and 4(1).</p>
<p>(19) Implementation of this Regulation could require major adaptations to the national statistical systems, and the Commission may therefore grant derogations to Member States.</p>		<p>Implementation of this Regulation could require major adaptations to the national statistical systems, and therefore the Commission should be entitled to grant derogations to Member States. Recital (19) on derogations should better be placed before recital (18) where reference is made to the power of the Commission to adopt implementing acts in respect of granting derogations to MS.</p>
<p>(20) Directive 95/46/EC of the European Parliament and of the Council⁹ and</p>	<p>(20) Directive 95/46/EC of the European Parliament and of the Council⁹ and</p>	<p>A reason to point at these areas specifically is not seen. IESS covers many areas important for</p>

⁸ Regulation (EU) No 182/2011 of the European Parliament and of the Council of 16 February 2011 laying down the rules and general principles concerning mechanisms for control by Member States of the Commission's exercise of implementing powers (OJ L 55, 28.2.2011, p. 13).

⁹ Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (OJ L 281, 23.11.1995, p. 31).

<p>Regulation (EC) No 45/2001 of the European Parliament and of the Council¹⁰ should apply to the statistical data covered by this Regulation. In particular, statistical data that are required for the purpose of developing and monitoring Union and national actions and strategies in the areas of public health and health and safety at work should be regarded as data processed for reasons of substantial public interest.</p>	<p>Regulation (EC) No 45/2001 of the European Parliament and of the Council¹⁰ should apply to the statistical data covered by this Regulation. In particular, statistical data that are required for the purpose of developing and monitoring Union and national actions and strategies in the areas of public health and health and safety at work should be regarded as data processed for reasons of substantial public interest.</p>	<p>monitoring and development, other than public health, health and safety at work.</p> <p>Due to the fact that General Data Protection Regulation (EU) No 2016/679 entered into force, and that it repeals the Directive 95/46 with effect from 25 May 2018, a modification of the recital should be considered.</p> <p>Furthermore, it should be taken into account that the GDPR acknowledges the special needs of data processing for statistical purposes in many respects (as can be seen e.g. in Article 9(2)(j); Article 14(5)(b) or Article 17(3)(d). Therefore the Commission should review the possibility to make use of Article 89(2) and provide - where appropriate - derogations for the needs of IESS.</p> <p>It should be mentioned that Regulation (EC) No 223/2009 rules the confidentiality rules.</p>
<p>(21) The objective of this Regulation, namely the establishment of a common framework for European statistics relating to persons</p>	<p>(21) Since tThe objective of this Regulation, namely the establishment of a common framework for European statistics relating to</p>	

¹⁰ Regulation (EC) No 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data (OJ L 8, 12.1.2001, p. 1).

<p>and households, based on data at individual level collected from samples, cannot be sufficiently achieved by the Member States but can instead, for reasons of harmonisation and comparability, be better achieved at EU level. The EU may therefore adopt measures, in accordance with the principle of subsidiarity set out in Article 5 of the Treaty on European Union. In accordance with the principle of proportionality, as set out in that Article, this Regulation does not go beyond what is necessary in order to achieve that objective.</p>	<p>persons and households, based on data at individual level collected from samples, cannot be sufficiently achieved by the Member States but can rather, instead for reasons of harmonisation and comparability, be better achieved at Union EU-level, the Union The EU may, therefore, adopt measures, in accordance with the principle of subsidiarity set out in Article 5 of the Treaty on European Union. In accordance with the principle of proportionality, as set out in that Article, this Regulation does not go beyond what is necessary in order to achieve that objective.</p>	<p>The principal of subsidiarity is not fulfilled at present. In the case of production of statistics, this principal is best achieved through output harmonisation. The current suggestion contains elements of input harmonisation. See suggested changes regarding article 6(1)(f).</p>
<p>(22) The European social statistics collected from samples and the data collection process should become more efficient and relevant. The comparability and coherence of the data in the long run should be ensured. European statistics on persons and households based on data at individual level collected from samples are currently regulated in a number of separate legislative acts which should be replaced by this Regulation. It is therefore necessary to repeal Council Regulation (EC)</p>	<p>(22) The European social statistics compiled collected from sample surveys and the data collection process should become more efficient and relevant. The comparability and coherence of the data in the long run should be ensured. European statistics on persons and households based on data at individual level collected from samples are currently regulated in a number of separate legislative acts which should be replaced by this Regulation. It is therefore necessary to repeal Council Regulation (EC) No 577/98¹¹</p>	<p>Recital 22 should be split, the first part covers quality aspects and the second part concerns the repeal of the existing regulation</p>

<p>No 577/98¹¹ and Regulation (EC) No 1177/2003 of the European Parliament and of the Council¹².</p>	<p>and Regulation (EC) No 1177/2003 of the European Parliament and of the Council¹².</p>	
	<p>(22a) European statistics on persons and households based on data at individual level collected from samples are currently regulated in a number of separate legislative acts which should be replaced by this Regulation. It is therefore necessary to repeal Council Regulation (EC) No 577/98¹¹ and Regulation (EC) No 1177/2003 of the European Parliament and of the Council¹² and to amend Regulation (EC) No 808/2004, Regulation (EC) No 452/2008 and Regulation (EC) No 1338/2008 of the European Parliament and of the Council.</p>	<p>The parts of the current Regulations on EHIS, AES and ICT-HH which are newly regulated by this regulation must expire when this regulation applies.</p> <p>The Commission should provide a clarification from as regards those parts of the Regulations (EC) No 452/2008, 1338/2008 and 808/2004, covering respectively the domains Adult Education Survey, EHIS and ICT usage in households, which are being replaced by new provisions in this Regulation but are not being legally repealed.</p>
<p>(23) The European Data Protection Supervisor has been consulted.</p>		<p>MSs would like to receive the opinion of the EDPS. This opinion should also be discussed in the Council Working Party.</p>

¹¹ Council Regulation (EC) No 577/98 of 9 March 1998 on the organisation of a labour force sample survey in the Community (OJ L 77, 14.3.1998, p. 3).

¹² Regulation (EC) No 1177/2003 of the European Parliament and of the Council of 16 June 2003 concerning Community statistics on income and living conditions (EU-SILC) (OJ L 165, 3.7.2003, p. 1).

(24) The European Statistical System Committee has been consulted,		
HAVE ADOPTED THIS REGULATION:		
<i>Article 1</i>		
<i>Subject matter</i>		
1. This Regulation establishes a common framework for European statistics relating to persons and households, based on data at individual level collected from samples of those persons and households.	<p>1. This Regulation establishes a common framework for the development, production and dissemination of European social statistics relating to persons and households, based on data at individual level collected from samples of those persons and private households.</p> <p><u>Alternative proposal 1:</u></p> <p>1. This Regulation establishes a common framework for European social and European level indicators relating to persons and households, based on aggregated data or anonymised records at individual level collected from samples of those persons and households.</p> <p><u>Alternative proposal 2:</u></p> <p>1. This Regulation establishes a common</p>	<p>“Private” households for coherence with Art. 5(1)</p> <p>In the recitals and articles the terms “data”, “statistics”, “microdata” and “indicators” are used inconsistently. It is proposed that when referring to published output, the term “European social statistics” is used for the statistics produced by Member States, and “European social indicators” is used for the European level indicators are produced by Eurostat. Microdata that have been anonymised should be referred to as “anonymised records”, and defined as being “Observation unit level data which have been prepared in such a way that the observation unit cannot be identified, either directly or indirectly, when account is taken of all relevant means that might reasonably be used by a third party.”</p> <p>Data collected for the purposes of this regulation</p>

	framework for European statistics relating to persons and households, based on data at individual level collected from samples of those persons and households.	can be based on surveys as well as administrative data and/or other data sources. Therefore it is suggested to delete the wording ‘collected from samples’ throughout the regulation (including in recitals) as this wording presupposes data collection based on surveys.
2. This Regulation does not apply to population and housing censuses referred to in Regulation (EC) No 763/2008 ¹³ .	2. This Regulation does not apply to population and housing censuses referred to in Regulation (EC) No 763/2008¹³.	There are many other regulations this article does not refer to, why mention this one. In addition in paragraph 1, reference is made to “ <u>samples</u> of those persons and households” so censuses are excluded. The Commission should explain also why the census and housing regulation are mentioned, but not the regulations on demography and migration. Art 1 should be consistent with recital 11, so that all the regulations to which this one does not apply are listed (e.g. Reg. (EU) No 1260/2013 on European demographic statistics).
<i>Article 2</i>		
<i>Definitions</i>		
For the purposes of this Regulation, the following definitions shall apply:		The Interpretative Provisions should be created in order to include terminology. It is necessary to review of concepts, in particular: 'domain', 'topic'.

¹³ Regulation (EC) No 763/2008 of the European Parliament and of the Council of 9 July 2008 on population and housing censuses (OJ L 218, 13.8.2008, p. 14).

<p>(a) ‘pre-checked data or microdata’ means data or microdata verified by the Member States, on the basis of agreed common validation rules;</p>	<p>(a) ‘pre-checked data or microdata’ means data or non-identifiable microdata verified by the Member States; on the basis of agreed common validation rules;</p> <p><u>Alternative proposal:</u></p> <p>(a) ‘pre-checked data or microdata’ means data or microdata verified by the Member States, on the basis of agreed common validation rules;</p>	<p>The amendment should clarify that microdata means non-identifiable microdata, in line with Article 10(2). In addition the meaning of “agreed common validation rules” has to be clarified (does it mean handbooks, guidelines or the likes?)</p> <p>It is proposed to delete the second part of the phrase because it concerns rules, which are not implemented by any legal act. Elements of soft law should rather be included in recitals and not Articles.</p>
<p>(b) ‘domain’ means one or several data sets organised in order to cover particular topics;</p>		
<p>(c) ‘observation unit’ means an identifiable entity about which data can be obtained;</p>		
<p>(d) ‘topic’ means the content of the information to be collected about the observation units, each topic covering a number of detailed topics;</p>		
	<p>(da) ‘detailed topic’ means the detailed content of the information to be collected about the observation units related to a specific topic;</p>	

<p>(e) ‘administrative records’ mean data generated by a non-statistical source, usually a public body, the aim of which is not to provide statistics, for its own purposes;</p>	<p>(e) ‘administrative records’ mean data generated for its own purposes by a non-statistical source, usually a public body, the aim of which is not to provide statistics, for its own purposes;</p>	<p>The need to define “administrative records” is not seen since it is terminology already included in other statistical legislation, as it the case of Regulation (EC) No 223/2009.</p> <p>It should be clarified whether this definition does not contradict the role of ONA’s. Depending on national situation administrative records can also be received from ONA’s. For example, demographic records used in the surveys are received from the ONA which also provides official statistics on refugees, asylum seekers.</p>
<p>(f) ‘ad hoc subject’ means themes that are of a particular interest for users at a specific point in time but that are not included in the regular data sets. ;</p>	<p>(f) ‘ad hoc subject’ means themes detailed topics that are of a particular interest for users at a specific point in time but that are not included in the regular data sets;</p>	
<p>(g) ‘headline indicator’ means widely used information that serves to monitor a central objective of EU policy.</p>		<p>It is considered that it is futile to mention definition of headline indicators, if at this point the precise content of these indicators is unknown – as this regulation goes beyond, for example, headline indicators of Europe 2020. Thus headline indicators mentioned in this regulation can refer to anything and are too vague.</p>

	(h) ‘anonymised records’ means observation unit level data which have been prepared in such a way that the observation unit cannot be identified, either directly or indirectly, when account is taken of all relevant means that might reasonably be used by a third party;	
<i>Article 3</i>		
<i>Data sets</i>		<p>The proposal of the Commission to make the voluntary data collections on time use and consumption legally binding is not advocated. This will lead to an extension of the European regulatory framework and also to additional information obligations for Member States. The current Impact Assessment does not give clear reasons why the European Union should act in these two domains by means of legislation.</p> <p>In addition, the proposal of the Commission to establish a legal framework with effect from 1 January 2025 for the domains time use and consumption will lead to additional development and implementation costs for Member States.</p> <p>Moreover, before introducing enhanced obligations in the form of new mandatory data collections on time use and consumption, studies on the feasibility and costs, and the benefits of the availability of the data for the development and evaluation of EU policy in relation to the costs of the data collections, burden on respondents, quality and comparability of these enhanced data collections would need to be</p>

		undertaken. Depending in particular on the assessment by the Commission of the results of the pilot studies on time use and consumption it is the Commission's right of initiative, whenever appropriate, to submit amending proposals to this Regulation.
1. The data collection referred to in Article 1 shall be organised into the following domains:		A clear definition of "data sets" and their link to "domains" and "topics/detailed topics" is missing. The heading refers to Data sets, then the words data collection is used in the first paragraph. Given the importance of data sets in the subsequent parts of the Regulation, in particular with respect to Article 6 and the foreseen implementing regulations for each dataset, datasets should be added to the definition list of key elements of the Regulation (either to the list of definitions in Article 2 or here).
(a) labour market,		
(b) income and living conditions,		
(c) health,		
(d) education and training,		
(e) use of information and communication technologies,		
(f) time use,	(f) — time use,	<u>10 MSs do not support the inclusion of time use as a domain.</u> Data collection on time use is very costly and burdensome, for both respondents and national statistical institutes or other national authorities.

		<p>The Impact Assessment shows that the costs of introducing a mandatory time-use survey in all Member States will be extremely high. Moreover, the availability of entirely harmonised data necessary for developing and evaluating EU policy purposes is questionable and not sufficiently demonstrated in the Impact Assessment.</p> <p>The costs implications for national budgets are disproportionate and are not justified by the benefits for the development and evaluation of European policy.</p> <p>In the framework of the Better Regulation policy it is not advocated that the European Union should act in this domain with hard law (regulations).</p> <p>Furthermore, it is found premature to legislate on this issue since the regulation is not supposed to apply until 2025 in this domain.</p>
(g) consumption.	(g) consumption.	<p><u>3 MSs do not support the inclusion of consumption as a domain.</u></p> <p>The Household Budget Survey (HBS) is a national survey mainly focusing on consumption expenditure by households. It is conducted on a voluntary basis and its primary aim at national level is to calculate weights for the Consumer Price Index.</p> <p>In order to achieve further harmonisation of the survey information, the Commission (Eurostat) regularly issues recommendations. In the</p>

		<p>framework of the Better Regulation policy we do not advocate that the European Union should act in this domain with hard law (regulations). Instead of expanding the legislative framework the Netherlands would prefer to continue making good use of existing concepts taking into consideration the circumstances and practices in Member States. The Netherlands also of the opinion that the costs implications for the national budgets are disproportionate and are not justified by the benefits for the development and evaluation of European policy.</p> <p><u>1 MS is in favour of the inclusion of the consumption domain in the IESS as they consider that there is a body of evidence that users need comparable data on consumption.</u></p>
	<p>(h) wealth.</p>	<p>There is a view that the current proposal does not reflect user needs in the area of Social Statistics. There is an increasing need for more information on the topics of Income, Consumption and Wealth. We welcome the inclusion of consumption however wealth is largely being ignored in the current IESS proposal. The proposed approach is to include it in a small SILC module by asking a limited number of questions on indebtedness. In order to adequately meet user requirements in wealth statistics a dedicated survey is required.</p> <p>In order to accommodate a wealth survey that other lower priority topics such as Time Use should be out of scope of the IESS Regulation.</p>

<p>2. The data sets shall cover topics common to all domains in addition to the following specific topics, as further detailed in Annex I:</p>	<p>2. The data sets shall cover topics common to all domains in addition to the following specific topics, as further detailed in Annex I.</p> <p><u>Alternative proposal 1:</u></p> <p>2. The data sets shall cover topics common to all domains in addition to the following specific topics, as further detailed in Annex I:</p>	<p>The wording is confusing because it does not entirely reflect the wording in Annex I, which uses the terms domain, topic and detailed topics. In order to avoid confusion, it is suggested that the term “specific” be removed.</p> <p>In addition, this paragraph requires further clarification, because it is unclear which topics are common to all domains and which topics are not.</p> <p>It will be much clearer to distinguish between common topics (a, b and e according to Annex I) and specific topics (all other).</p> <p>The detailed topics listed in Annex I do not in themselves provide a sufficient description of the scope and content of the statistical information MSs are obliged to produce and deliver. There are large variations in terms of the number and types of variables needed for each detailed topic. The choice and definition of some variables may have large implications in terms of costs and burden on respondents and should therefore be considered essential elements for this regulation.</p> <p>It is seen appropriate to ask the Commission to provide as a 4th column to Annex 1, a list of the variables related to each detailed topic. Such a list of variables would clarify the scope and content of the regulation and would provide transparency regarding the implications of changing the list of detailed topics.</p> <p>Once the list of variables is established, it can be decided which variables are considered essential</p>
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	<p><u>Alternative proposal 2:</u></p> <p>2. The data sets shall cover topics common to all domains in addition to the following specific topics, as further detailed in Annex I:</p> <p>VARIANT 2.1:</p> <p>2a. The topics are itemized in the followed detailed topics: [Copy here the table included now in Annex I]</p> <p>VARIANT 2.2:</p> <p>2a. The Commission is empowered to adopt implementing acts in accordance with Article 16, to specify the detailed topics related with each topic.</p> <p>When the Commission amends the detailed topics listed in the implementing acts to reflect relevant technical, social and economic developments and respond to the new needs of users, it shall ensure that:</p> <p>(a) such amended implementing acts do</p>	<p>to the regulation and which variables might not be considered essential. In order to ensure the needed flexibility, it should be possible to make changes to this list of variables and provisions on how to do so should be included in the regulation.</p> <p>Moreover, some of the detailed topics listed in Annex I are ad hoc topics, others are not. To clarify this, Annex I should include as well information on the frequency of the various topics.</p>
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	<p>not impose a significant additional burden or cost on the Member States or on respondents;</p> <p>(b) no more than 20 per cent of the detailed topics listed in the implementing acts are changed for each domain. For the domains for which data are collected with an infra-annual or annual periodicity, these changes shall represent a maximum of 10 per cent of the list of detailed topics. Those maximum percentages shall apply to four consecutive years. The number of detailed topics that may be changed shall be rounded up to the nearest integer.</p>	
(a) person and household characteristics,		
(b) labour market participation,		
(c) job tenure and previous work experience,		
(d) working conditions including working hours and working time arrangements,		
(e) educational attainment and background,		
(f) participation in education and training,		

(g) health: status and disability, care and determinants,		There is the MS which is not against the inclusion of GALI in this specific topic since it is appreciated that the relevance of such data to Social Statistics. This can potentially increase the opportunities for data matching between data sets over time. However, the inclusion of GALI should not be from the start of the coming into force of the Regulation and also, should be covered by the minimum no. of questions possible.
(h) income, consumption and wealth, including debts,		A very clear definition of what constitutes “wealth” would be required during the implementation stage. There is the MS not supporting the inclusion of this consumption as a domain, but it is willing to include it as a topic under the domain Living Conditions.
(i) living conditions, including material deprivation, housing, living environment and access to services,		
(j) quality of life, including social and cultural participation and wellbeing,		Definitions of what constitute “quality of life” and “wellbeing” are needed.
(k) allocation of time, and	(k) allocation of time, and	<u>10 MSs oppose the inclusion of this topic.</u>
(l) participation in the information society.		

<p>3. The precision requirements and the characteristics of the samples used for the different domains shall be as specified in Annexes II and III, respectively.</p>		
<p>4. The Commission is empowered to adopt delegated acts in accordance with Article 15 to amend the detailed topics listed in Annex I so as to reflect relevant technical, social and economic developments and respond to the new needs of users. In exercising this power, the Commission shall ensure that:</p>	<p>4. The Commission is empowered to adopt delegated acts in accordance with Article 15 to amend the detailed topics listed in Annex I so as to reflect relevant technical, social and economic developments and respond to the new needs of users. In exercising this power, the Commission shall ensure that:</p> <p><u>Alternative proposal 1:</u></p> <p>4. The Commission is empowered to adopt delegated implementing acts in accordance with Article 15 16(2) to amend the detailed topics listed in Annex I so as to reflect relevant technical, social and economic developments and respond to the new needs of users. In exercising this power, the Commission shall ensure that:</p> <p><u>Alternative proposal 2 (linked with the alternative proposal 2 for amendment of the Art.3(2):</u></p> <p>VARIANT 2.1:</p> <p>4. The Commission is empowered to adopt delegated implementing acts in</p>	<p><u>3 MSs support an amendment of the detailed topics by OLP.</u></p> <p>The detailed topics are an essential element to this regulation, with substantial impact on costs in the member states. The power to change the detailed topics should therefore not be delegated to the Commission.</p> <p>Amendment of the detailed topics by the DA has the potential to reduce control over costs and burden.</p> <p><u>3 MSs support an amendment of the detailed topics by the implementing acts.</u></p>

	<p>accordance with Article 16 to amend the detailed topics listed in paragraph 2a so as to reflect relevant technical, social and economic developments and respond to the new needs of users. In exercising this power, the Commission shall ensure that:</p> <p>VARIANT 2.2: No need of this article because the Commission have the power to adopt and change the detailed topics. The limits are included in article 2a.</p>	<p>There is the MS which supports a more flexible approach as proposed with this framework regulation and, agrees, that only with the right amount of flexibility new information demands can be properly addressed, nonetheless expresses the view, that the legal instruments (i.e. delegated acts and implementing acts) allowing flexibility must be used properly with regard to balancing flexibility on one side and risk for MSs to face significant additional burden on the other. For this reason, there are especially serious concerns regarding Article 3(4). In the current proposal the delegation of power is too broad.</p> <p>It is proposed to add here that in putting forward an action the Commission shall provide information on reasons justifying the action, the objectives of the action and expected results, and assessment of the burden on respondents and of the production costs, in line with the Regulation (EC) No 223/2009; Art 14(3).</p>
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<p>(a) such delegated acts do not impose a significant additional burden or cost on the Member States or on respondents;</p>	<p>(a) such delegated acts do not impose any significant additional burden or cost on the Member States or on respondents;</p> <p><u>Alternative proposal 1:</u></p> <p>(a) such delegated implementing acts do not impose a significant additional burden or cost on the Member States or on respondents;</p> <p><u>Alternative proposal 2 (linked with the alternative proposal 2 for amendment of the Art.3(2):</u></p> <p>VARIANT 2.1:</p> <p>(a) such delegated implementing acts do not impose a significant additional burden or cost on the Member States or on respondents;</p> <p>VARIANT 2.2:</p> <p>No need of this article because the Commission have the power to adopt and change the detailed topics. The limits are included in article 2a.</p> <p><u>Alternative proposal 3:</u></p> <p>(a) such delegated acts do not impose an significant additional burden or cost on the Member States or on respondents;</p>	<p>The word „significant” is not precise enough, a more accurate wording is needed. The term “significant” has to be further explained and amplified in order to be meaningful. Would, for instance, “a significant additional burden or cost on the Member States” entail a change in the mode of data collection? Moreover, the introduction of certain new questions that may be sensitive, can potentially affect the survey</p>
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	<p>Alternative proposal 4:</p> <p>(a) such delegated acts aim at cost and burden neutrality or reduction and do in any case not impose a significant additional cost or burden on the Member States or on the respondents;</p>	<p>response rate negatively and can compromise the quality of the data collected for those variables that are most characteristic of the survey in question (e.g. Unemployment and Hours of Work in the LFS).</p>
<p>(b) no more than 20 per cent of the detailed topics listed in Annex I are changed for each domain by delegated acts. For the domains for which data are collected with an infra-annual or annual periodicity, these changes shall represent a maximum of 10 per cent of the list of detailed topics. Those maximum percentages shall apply to four consecutive years. The number of detailed topics that may be changed shall be rounded up to the nearest integer.</p>	<p>(b) no more than 20 per cent of the detailed topics listed in Annex I are changed for each domain by delegated acts. For the domains for which data are collected with an infra-annual or annual periodicity, these changes shall represent a maximum of 10 per cent of the list of detailed topics. Those maximum percentages shall apply to four consecutive years. The number of detailed topics that may be changed shall be rounded up to the nearest integer.</p> <p>Alternative proposal 1:</p> <p>(b) no more than 20 per cent of the detailed topics listed in Annex I are changed for each domain by delegated implementing acts. For the domains for which data are collected with an infra-annual or annual periodicity, these changes shall represent a maximum of 10 per cent of the list of detailed topics. Those maximum percentages shall apply to</p>	

	<p>four consecutive years. The number of detailed topics that may be changed shall be rounded up to the nearest integer.</p> <p><u>Alternative proposal 2 (linked with the alternative proposal 2 for amendment of the Art.3(2)):</u></p> <p>VARIANT 2.1:</p> <p>(b) no more than 20 per cent of the detailed topics listed in Annex I paragraph 2a are changed for each domain by delegated implementing acts. For the domains for which data are collected with an infra-annual or annual periodicity, these changes shall represent a maximum of 10 per cent of the list of detailed topics. Those maximum percentages shall apply to four consecutive years. The number of detailed topics that may be changed shall be rounded up to the nearest integer.</p> <p>VARIANT 2.2:</p> <p>No need of this article because the Commission have the power to adopt and change the detailed topics. The limits are included in article 2a.</p> <p><u>Alternative proposal 3:</u></p> <p>(b) no more than 20 per cent of the detailed topics listed in Annex I are changed for each domain by delegated acts. For the domains for which data are collected with an infra-annual or annual periodicity, these changes</p>	<p>Proposals of changes are intended to prevent excessive or unwarranted increase in burden on both the respondents and the Member States. Additional burden can in fact generate financial implications, and also potential respondents'</p>
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	<p>shall represent a maximum of 10 per cent of the list of detailed topics. Those maximum percentages shall apply to four consecutive years. The number of detailed topics that may be changed shall be rounded up to the nearest integer. The number of detailed topics should not exceed the number of detailed topics in binding version for each domain that is the quantity of new detailed topics should not exceed the quantity of deleted detailed topics.</p> <p><u>Alternative proposal 4:</u></p> <p>(b) no more than 20 per cent of the detailed topics listed in Annex I are substituted changed for each domain by delegated acts, and the effect of the substitution shall be no increase in the total number of detailed topics. For the domains for which data are collected with an infra-annual or annual periodicity, these substitutions changes shall represent a maximum of 10 per cent of the list of detailed topics. Those maximum percentages shall apply to four consecutive years. The number of detailed topics that may be changed shall be rounded up to the nearest integer.</p>	<p>discontent that could lead to the decrease in the response rate.</p> <p>It remains unclear how it can be prevented in the long run that such amendments lead to a significant increase in burden for the Member States and respondents compared with the situation now.</p>
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		<p>Especially two points should be specified more clearly in the Draft:</p> <ul style="list-style-type: none"> a) Does the limit of 20 % refer to the whole range of detailed topics in Annex 1? b) Does this mean that 20% detailed topics could be replaced in four consecutive years and the number of detailed topics must be the same or 20% of detailed topics could be added? c) It is understood correctly that in whole four years period 20% of detailed topics could be changed and not every year 20%? d) How exactly does the combination of the limits of 20 % and 10 % work together? <p>The proposed threshold of amending the detailed topics by a maximum of 20% for each domain and 10% of the detailed topics for data collected with an infra-annual or annual periodicity are too high for the MS. In addition, it is suggested an absolute number of detailed topics per domain that may be amended by means of delegated acts instead of percentages.</p> <p>There are large variations in terms of the number and type of variables needed for each detailed topic. It is the nature of the topic that counts, and such a nature cannot be calculated in percentages. One detailed topic can be replaced by another which is much more onerous as regards the collection of the relevant variables. Since the specific set of variables needed for each detailed topic is not known, this paragraph</p>
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		<p>does not provide adequate safeguards - e.g. changing 20 per cent of the detailed topics for one domain may have large implications on costs and burden if those specific topics cover many variables.</p> <p>It is suggested that the list of variables is included as a 4th column in Annex I (cf. comment to 3(2) before deciding on possible ways to change Annex I.</p>
	<p>(c) any change in detailed topics listed in Annex I should be preceded by the feasibility study.</p> <p><u>Alternative proposal:</u></p> <p>(c) any new detailed topic added to the list of detailed topics in Annex I is off-set by dropping other detailed topic in the same domain so that the total number of detailed topics remains unchanged;</p> <p>(d) any new detailed topic added to the list of detailed topics in Annex I is duly assessed with respect to its feasibility in terms of reliable data collection from samples of households or persons and with respect to privacy issues on the side of responding units. Member States shall be involved in this assessment.</p>	<p>Implementation of changes should be tested before in terms of their legitimacy and assessment of expenses comparing to the results achieved.</p> <p>A clearer commitment that these changes are to be neutral in terms of response burden and the amount of information that needs to be collected under the particular domain as a whole, would be welcomed. Any proposed new detailed topic must be examined against this background, together with an investigation of its feasibility in terms reliable data collection and privacy issues on the side of responding units.</p>

<i>Article 4</i>		
<i>Multiannual rolling planning</i>		
<p>1. The Commission is empowered to adopt delegated acts in accordance with Article 15 to establish or adapt a multiannual rolling planning for eight years for the collection of data covered by this Regulation, in accordance with the periodicity specified in Annex IV. The Commission shall ensure that such delegated acts do not impose a significant additional burden or cost on the Member States or on the respondents.</p>	<p>1. The Commission is empowered to adopt delegated implementing acts in accordance with Article 15 16(2) to establish or adapt a multiannual rolling planning for eight years for the collection of data covered by this Regulation, in accordance with the periodicity specified in Annex IV. The Commission shall ensure that such delegated implementing acts do not impose a significant additional burden or cost on the Member States or on the respondents.</p>	<p><u>3 MSs support the use of implementing acts to establish or adapt a multiannual rolling planning.</u></p> <p>It is questioned whether here a delegated act is the appropriate instrument to establish a planning as proposed by the Commission. All the conditions to establish a multiannual planning are set in the basic act (domains, topics and detailed topics in Annex I and the domains in connection with the periodicity of the data collection in Annex IV.) The adoption of a multiannual planning is not intended to make changes to the text of the basic act by deleting or replacing certain parts or supplement it by the addition of new non- essential elements. The measures proposed are intended solely to give effect to existing rules already established in the basic act without adding new elements to the basic act. Therefore it is assumed that the measures proposed in this article would fall more under the scope of implementing powers than of delegated powers.</p> <p>In addition, it is observed that Article 4 of the proposal contains general open-ended provisions and broad principles. The delegation of power is not sufficiently circumscribed. Revised drafting of this article is required e.g. in order to limit the number of detailed topics and variables to be collected in one year. It should also be clear from</p>

	<p><u>Alternative proposal 2:</u></p> <p>1. The Commission is empowered to adopt delegated acts in accordance with Article 15</p>	<p>the text that data collection in one specific year should not exceed more than one domain in addition to the domains labour market and income and living conditions. The latter mains will be collected at least annually.</p> <p><u>5 MSs opposes the use of delegated acts to amend the multiannual rolling planning.</u></p> <p>These are essential elements with substantial impact on costs in the Member States. The power to establish or adapt the plan should therefore not be delegated to the Commission.</p> <p>It is also proposed that the Commission should include multiannual programme in an annex with the associated reference years. In compiling this multiannual programme the Commission should ensure that the volume of data collection is evenly distributed by calendar year.</p> <p>The use of a delegated act establish a multiannual rolling planning for eight years is excessive, since a data collection programme for such a period of time is bound to create burdens of cost and resources on the Member States at a time when several NSIs are experiencing budget cuts. Although a degree of flexibility for the Commission is important to ensure that changing user needs can be addressed, it is also important to balance this by restricting the amendment of detailed topics by delegated act.</p> <p>A more accurate wording of this article should be proposed: what does „significant additional</p>
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	<p>to establish or adapt a multiannual rolling planning for eight years for the collection of data covered by this Regulation, in accordance with the periodicity specified in Annex IV. The Commission shall ensure that such delegated acts do not impose an significant additional burden or cost on the Member States or on the respondents.</p> <p><u>Alternative proposal 3:</u></p> <p>1. The Commission is empowered to adopt delegated acts in accordance with Article 15 to establish or adapt a multiannual rolling planning for eight years for the collection of data covered by this Regulation, in accordance with the periodicity and first year of implementation specified in Annex IV. The Commission shall ensure that such delegated acts do not impose a significant additional burden or cost on the Member States or on the respondents.</p>	<p>burden” mean? Further clarifications and appropriate wording are necessary in order to understand the content of this multiannual rolling planning.</p> <p><u>1 MS proposes</u>, as regards the multiannual rolling planning, to take into account that a maximum of 4 domains could be carried at the same time.</p>
<p>2. This multiannual rolling planning shall specify the period during which data are collected for:</p>	<p>2. This multiannual rolling planning shall specify the period during for which data are collected for.</p> <p><u>Alternative proposal:</u></p> <p>2. This multiannual rolling planning shall specify the period during which data are collected for the detailed topics attached to the domains.</p>	<p>The aim of this change is to clarify the phrase: the reference period for which data are collected is important and not the period of their collection.</p> <p>While the advantages in terms of flexibility and responsiveness to new user needs are seen, there</p>

		are serious concerns whether these provisions are clear enough.
(a) the detailed topics attached to the domains,	(a) the detailed topics attached to the domains, as listed in Annex 1.	
(b) ad hoc subjects requested by the users, for the labour market and income and living conditions domains, as provided for in Annex IV. In exceptional and justified cases, these data may cover detailed topics other than those listed in Annex I.	<p>(b) ad hoc subjects requested by the users, for the labour market and income and living conditions domains, as provided for in Annex IV. In exceptional and justified cases, these data may cover detailed topics other than those listed in Annex I.</p> <p><u>Alternative proposal 1:</u> VARIANT1.1: (b) ad hoc subjects requested by the users, for the labour market and income and living conditions domains, as provided for in Annex IV. If the ad hoc subjects amend the detailed topics listed in Annex I, the amendment should be considered when calculating the limits set out in Article 3 (4)(b).</p> <p>VARIANT 1.2 (in case of implementing acts): (b) ad hoc subjects requested by the users, for the labour market and income and living</p>	<p>Moreover, there is no reason for the last sentence to be placed in an article devoted to regulate the multiannual rolling planning.</p> <p>“Ad hoc subjects” have to be regarded as new detailed topics not covered by Annex 1 (every 4 years as to Labour Market and 2 years for Income and Living conditions). A change to the detailed topic coverage, therefore, must comply with the rules set in Art. 3(4)(b). This implies that the number of “ad hoc subjects”, summed with the potential changes to detailed topics in Annex 1, shall not exceed the limits set out in Art. 3(4)(b)</p> <p>There is a necessity for limiting the number of variables in the frame of the ad hoc topics is seen (for example, like in LFS to 11 variables per topic).</p>

	<p>conditions domains, as provided for in Annex IV. In exceptional and justified cases, these data may cover detailed topics other than those listed in Annex I. The ad hoc subject shall not amend any detailed topic listed in Annex I.</p> <p><u>Alternative proposal 2:</u></p> <p>(b) ad hoc subjects requested by the users, for the labour market and income and living conditions domains, as provided for in Annex IV. In exceptional and justified cases, these data may cover detailed topics other than those listed in Annex I, as set out in Article 3(4).</p> <p><u>Alternative proposal 3 (linked with the alternative proposal 2 for amendment of the Art.3(2):</u></p> <p>(b) ad hoc subjects requested by the users, for the labour market and income and living conditions domains, as provided for in Annex IV. In exceptional and justified cases, these data may cover detailed topics other than those listed in Annex I paragraph 2a (or the implementing acts mentioned in paragraph 2a).</p> <p><u>Alternative proposal 4:</u></p> <p>(b) ad hoc subjects requested by the users, for the labour market and income and living conditions domains, as provided for in Annex IV. In exceptional and justified</p>	<p>A clarification on how provisions mentioned in Article 3(4)(b) apply in regard to the exceptional cases mentioned in this paragraph, is required.</p>
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	<p>cases, these data may cover detailed topics other than those listed in Annex I. Whenever those data are required, the Union shall provide financial contribution to national statistical institutes and other national authorities in accordance with Article 14.</p>	<p>It is proposed to add here that in putting forward an action, the Commission shall provide information on reasons justifying the action, the objectives of the action and expected results, and assessment of the burden on respondents and of the production costs, in line with the Regulation (EC) No 223/2009, Art. 14(3).</p>
	<p>2a. The multiannual rolling planning shall ensure that:</p> <ul style="list-style-type: none"> (a) the total number of (data collections / datasets) shall not exceed 4 in each calendar year (b) the total number of detailed topics assigned to (data collections / datasets) in each year of data collection, including detailed topics common to all domains and ad-hoc subjects referred to in paragraph 2 (b), shall not exceed <ul style="list-style-type: none"> - [40] detailed topics for the Labour market domain - [40] detailed topics for the Income and living conditions domain - [32] detailed topics for the Health domain 	<p>There are some missing specifications of capacity limits (e.g. the maximum number of data collections and the number of topics / detailed topics for each year and domain) as well as any reference to the “peaks and valleys” issue in capacity planning which was repeatedly discussed in the modernisation of social statistics agenda – both across years (maximum level of data collection requirements in a year), but also within years (linked to eventual limits on the timing of data collection phase for individual domains to particular time of the year). In order to achieve quality and efficiency, the even distribution of data collection burden is essential.</p>

	<p>[32] detailed topics for the Education and training domain</p> <ul style="list-style-type: none"> - [20] detailed topics for the Use of information and communication technologies domain - [24] detailed topics for the Consumption domain 	
<p>3. The adaptations of the planning referred to in paragraph 1 shall be made no later than 24 months before the beginning of the each data collection period, as specified in the planning. These adaptations shall aim to ensure effectiveness and consistency of the planning with users' needs.</p>	<p>3. The adaptations of the planning referred to in paragraph 1 shall be made no later than 24 months before the beginning of the each data collection period, excluding the domains: Health, Education and Training, Time Use and Consumption for which the adaptations of the planning shall be made no later than 36 months - as specified in the planning. These adaptations shall aim to ensure effectiveness and consistency of the planning with users' needs.</p>	<p>In the case of surveys carried out periodically every 4-6 or 10 years it is necessary to ensure adequate time for preparation and negotiation of the national law, which is prepared 1.5 - 2 years earlier. In addition, work on adapting the European questionnaire periodical surveys are usually more burdensome – they require re-translations, consultations, and often using new technological solutions.</p> <p>It seems to be unrealistic to assume that the first year of the implementing IESS will be 2019 (income year 2018 for income and living condition domain).</p> <p>A clarification what ad hoc user requirements are important and with what weights, is requested.</p>
<i>Article 5</i>		
<i>Statistical populations and observation units</i>		
<p>1. The statistical population shall consist of all persons usually residing in private households in each Member State.</p>	<p>1. The statistical population shall consist of all persons usually residing in private households in each Member State in accordance with the definition of 'usual residence' in</p>	<p>The term 'usually residing' should be clearly defined in the regulation. When the production of social statistics is mostly based on administrative data, the definition as proposed by the</p>

	<p>Regulation (EU) No 1260/2013 on European demographic statistics.</p>	<p>Commission might have enormous consequences. So the reference is made to the definition in the Regulation (EU) No 1260/2013 on demography statistics. In Accordance with this regulation ‘Usual residence’ shall mean the place where a person normally spends the daily period of rest, regardless of temporary absences for purposes of recreation, holidays, visits to friends and relatives, business, medical treatment or religious pilgrimage.</p> <p><u>1 MS proposes</u> that institutional households should be included in some domains e.g. Health, Labour Market.</p>
<p>2. The data collection shall be carried out in each Member State for a sample of observation units constituted by private households or by persons belonging to private households who usually reside in that Member State.</p>	<p>2. The data collection shall be carried out in each Member State for a sample of observation units constituted by private households or by persons belonging to private households who usually reside in that Member State.</p> <p><u>Alternative proposal:</u></p> <p>2. The data collection shall be carried out in each Member State for a sample of observation units constituted by private households or by persons belonging to private households who usually reside in whose usual residence is in that Member State. Usual residence and place of usual residence shall have the meaning given in Regulation (EU) No 1260/2013.</p>	<p>Limiting the statistical population to private households decreases the quality of statistics unnecessarily. The purpose of excluding i.e. living condition of persons in collective households for those countries that can capture them, is not seen.</p>

<i>Article 6</i>		
<i>Technical specifications of data sets</i>		
<p>1. The Commission shall be empowered to adopt implementing acts for the purpose of specifying the following technical items of the individual data sets:</p>		<p>The empowerment for the Commission to adopt implementing acts is too broad. The proposed broad empowerment is difficult to accept. The power conferred is to determine the entire scope and content of the statistical information obligations for Member States. In other words “what” information the Member States are obliged to provide is currently unclear. Those acts potentially have far-reaching consequences in terms of initial development and structural implementation costs for Member States, as well as burden on respondents.</p> <p>Concerns on how amended detailed topics will affect the technical specifications (variables) regulated in implementing acts were raised too. A change to the detailed topics should not result in an increase in variables and therefore in an increase of burden and costs for the MSs. For that reason a ‘burden clause’ in Art. 6, where the specification of the variables in the data sets is regulated, should be considered in the case of a new (re-) specification of the variables in the subsequent process following the amendment of detailed topics.</p> <p>The proposal has no provisions for time limits for the provision of these technical specifications. In our opinion these specifications have to be available at least 24 month before the</p>

		<p>data collection starts.</p> <p>A clearer definition of data set as subject of the implementing regulations is requested.</p>
(a) the number and description of variables;	(a) the number and description of variables;	<p><u>2 MSs propose to delete the point.</u></p> <p>The detailed topics of Annex I and the variables to be collected are inseparably connected. In the current proposal it is unclear “what” information the Member States are obliged to deliver. The number and the description of the variables “the what Member States are obliged to deliver” is an important part to this regulation.</p> <p>In addition, it is questioned whether an implementing act is the appropriate legal instrument for establishing the number and descriptions of the variables. Measures intended to materially expand the scope and content of the legislative framework (basic act) would fall more under the scope of Article 290 TFEU (delegated acts) than under the scope of Article 291 TFEU (implementing acts).</p> <p><u>1 MS suggests</u> to include the description of variables in Annex I (cf. comment on Article 3(2):</p> <p>A clarification is needed on what is meant by using an implementing act to specify the number and description of variables to be collected.</p>

(b) the statistical classifications;	(b) the statistical classifications;	The specification on statistical classifications may have large implications on MSs and are considered essential elements. Therefore it is proposed to apply the principle used in the HICP regulation, in which the ECOICOP-classification is specified in the ‘definitions’ section in the basic act and furthermore attached in an annex. The same procedure could be used in this regulation.
(c) the precise characteristics of the statistical populations, the observation units and the respondents;		A clarification on what kind of specifications the Commission have in mind regarding the statistical populations, the observation units and the respondents, should be provided by the Commission.
(d) the reference periods and dates;	(d) the reference periods and dates;	Annex III already specifies the reference periods for several domains. It is suggested to specify for all domains the reference periods and dates in Annex III and accordingly delete Art. 6(1)(d). Any potential changes to reference periods could give rise to substantial problems for example, in relation to consistency in data reporting; comparison between years; ability to apply seasonal adjustment and; updating systems. Additionally, some Member States may have difficulty in complying with Annex III relating to the national sample for the reference quarter being distributed uniformly in all weeks of the quarter.

<p>(e) the requirements relating to geographical coverage, sample features including subsampling, technical aspects of the fieldwork, editing and imputation, weighting, estimation and variance estimation;</p>	<p>(e) the requirements relating to geographical coverage, sample features including subsampling, technical aspects of the fieldwork, editing and imputation, weighting, estimation and variance estimation, and the method of assessing compliance with precision conditions.</p> <p><u>Alternative proposal:</u> (e) the requirements relating to geographical coverage, sample features including subsampling, technical aspects of the fieldwork, editing and imputation, weighting, estimation and variance estimation;</p>	<p>This is in line with the Final Report of the Task Force on Precision Requirements in the LFS (submitted to LAMAS on 25th June 2014). In this Report it is concluded that: <i>“As regards the second question (assessment of compliance in practice), the task force puts forward a principle of tolerance, meaning that compliance should be monitored over long periods and not for single points in time. Distinction should be made between occasional and systematic deviations. Only the latter should be considered as non-compliance. The compliance assessment should focus on the design features of the national LFSs. Non-compliance may arise from an insufficient sample size, a high non-response, an ineffective stratification, systematic imbalances in the actual samples, etc. This principle of tolerance prevents that NSIs are forced to continuously adapt the LFS to changing conditions”.</i></p> <p>Changes in the geographical coverage may impose large costs on MSs and as such should not be decided in implementing acts. Furthermore, methodological choices related to sample features, weighting, variance estimation etc. should be left to MSs to decide upon since such choices will depend on national specificities and the specific data used, not least when administrative data are used. This ensures both cost-effectiveness and quality and does not prevent outputs from being harmonised. Since</p>
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		<p>para 6(1)(e) may conflict with continued use of administrative data in the production of social statistics, it is proposed to delete the paragraph.</p> <p>What is meant by “technical aspects of the fieldwork” needs to be clarified further, as it seems to be imposing an input harmonisation which is violating the principle of subsidiarity.</p> <p>One MS considers the scope of implementing powers too wide, especially as regards technical aspects of the field work. Also, sufficient coherence and comparability can be achieved outside legal basis by working together with Member States’ experts and using guidelines and manuals.</p>
<p>(f) where necessary to achieve a high level of comparability for employment and unemployment data in the labour market domain, the methodology to be used to collect the data. This may include, where necessary, the order and placing of the questions in the questionnaire. This necessity shall be duly justified.</p>	<p>(f) where necessary to achieve a high level of comparability for employment and unemployment data in the labour market domain, the methodology to be used to collect the data. This may include, where necessary, the order and placing of the questions in the questionnaire. This necessity shall be duly justified.</p>	<p><u>7 MSs propose to delete the provision.</u></p> <p>The proposal on input harmonisation which infringes on the principal of subsidiarity. Output harmonisation sets a requirement on countries to produce coherent and comparable statistics in terms of outputs and this should serve to create a definition of what needs to be surveyed. Member States should be left with the task of working out suitable national concepts and measurement procedures with which the output concept can be portrayed. The use of output harmonisation is transparent to users and it has no visible effect on the results.</p> <p>In addition, due to cultural and legal differences between countries, input harmonisation is no good approach to achieve high level of comparability.</p>

	<p><u>Alternative proposal 2:</u> (f) where necessary to achieve a high level of comparability for employment and unemployment data in the labour market domain, the methodology to be used to</p>	<p>Furthermore It is an obligation for Member States that the data collected entirely fulfil the quality criteria defined in Article 12(1) of Regulation (EC) No 223/2009. The Commission shall assess the quality of the data transmitted. In addition the measure proposed may also have far-reaching consequences in terms of costs if Member States have to adapt national data collection systems. Therefore we are of the opinion that this paragraph is redundant and should be removed.</p> <p>The proposal may conflict with one MS's continued use of administrative data in the production of social statistics.</p> <p>Applying model questionnaire is supported but only as recommendation not as mandatory element. Sufficient coherence and comparability can be achieved outside legal basis by working together with Member States' experts and using guidelines and manuals.</p> <p>One MS agrees on the importance of input harmonisation, in principle. However this is difficult to implement across Member States especially since Member States are using different modes of data collection.</p> <p>The order and position of questions should not be laid down in a legal act as it is necessary to have the possibility for national deviations to take into account the requirements e.g. for integrated</p>
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	<p>collect the data. This may include, where necessary, the order and placing of the questions in the questionnaire. This necessity shall be duly justified.</p> <p>Alternative proposal 3:</p> <p>(f) where necessary to achieve a high level of comparability for employment and unemployment data in the labour market domain, the methodology to be used to collect the data. This may include, where necessary, the order and placing of the questions in the questionnaire. This necessity shall be duly justified.</p>	<p>surveys at national level or for dependent interviewing.</p> <p>National adaptations are needed in the design of questionnaires].</p> <p>Phrase “the methodology to be used to collect the data” is unclear and open to different interpretations.</p> <p>It is recommended to take into account the results of the WG LAMAS consultation (deadline 16th September) and discussion of the December meeting as regards to the questions in the questionnaire.</p>
<p>2. When items are common to several data sets, the Commission shall be empowered to adopt implementing acts for the purpose of specifying the following technical characteristics of the data sets:</p>		
<p>(a) the list and description of variables;</p>	<p>(a) the list and description of variables;</p>	<p><u>2 MSs propose to delete the point with the justification as provided under 6(1)(a).</u></p> <p>In addition, a clarification why article 6(1)(a) refers to “the number” while this paragraph</p>

		refers to “the list”, whether there is a difference between the two provisions should be provided by the Commission.
(b) the statistical classifications;	(b) the statistical classifications;	The same justification as provided under 6(1)(b).
(c) the precise characteristics of the statistical populations and of the observation units.		The same comments as under 6(1)(c).
3. For the data sets on monthly unemployment relating to the labour market domain, the Commission shall be empowered to adopt implementing acts for the purpose of describing the variables and the length, quality requirements and level of detail of the time series to be transmitted		Monthly unemployment relating to the labour market domain has not been included so far therefore an explanation is requested; furthermore its wording is inaccurate.
4. These implementing acts shall be adopted in accordance with the examination procedure referred to in Article 16(2).	4. These implementing acts shall be adopted in accordance with the examination procedure referred to in Article 16(2) and shall be adopted at least 12 months before the beginning of the individual data sets collection period. By adaption of an implementing act the Commission shall aim at cost and burden neutrality or reduction.	This preparatory time is at least needed for national implementation. This article should also include provisions concerning cost and burden.
<i>Article 7</i>		
<i>Standards for transmission and exchange of information</i>		
1. Technical standards shall be put in place to facilitate the exchange and sharing of information between the Commission		

(Eurostat) and the Member States, in particular for the purpose of supporting quality management and process documentation related to the statistics covered by this Regulation.		
2. The technical standards shall cover statistical concepts, processes and products, including data and metadata.	2. The technical standards shall cover statistical concepts, processes and products, including data and metadata.	One MS finds that the specific technical solutions used for handling metadata etc. should be left to MS to decide upon ensuring quality and cost-effective solutions tailored to the national context and the specificities of the data.
3. The Commission shall be empowered to adopt implementing acts to establish the technical standards referred to in paragraph 1. These implementing acts shall be adopted in accordance with the examination procedure referred to in Article 16(2).		
<i>Article 8</i>		
<i>Data sources and methods</i>		
1. Member States shall provide the data referred to in Article 1 by using one or a combination of the following sources, provided that they meet the quality requirements given in Article 12:		
(a) information directly provided by the respondents;	(a) information directly provided by the respondents surveyed units	One NSI wonders whether mention of ‘directly’ in this paragraph could imply excluding proxy and CAWI interviews. If so, than word ‘directly’ should be deleted.
(b) administrative records and any other	(b) administrative records and any other	

<p>sources, methods or innovative approaches in so far as they allow for the production of data that are comparable and compliant with the applicable specific requirements laid down by this Regulation.</p>	<p>sources, methods or innovative approaches in so far as they allow for the production of data that are comparable and compliant with the applicable specific requirements laid down by this Regulation.;</p> <p>(ba) other sources, methods or innovative approaches in so far as they allow for the production of data that are comparable and compliant with the applicable specific requirements laid down by this Regulation.</p> <p><u>Alternative proposal:</u></p> <p>(b) administrative records and any other sources, methods or innovative approaches in so far as they allow for the production of data that are comparable and compliant with the applicable specific requirements laid down by this Regulation.</p>	<p>The statement “any other sources, methods or approaches” is not sufficiently clear. If it refers to the use of Big Data it is clearly premature to include this provision in the framework regulation.</p> <p>There are doubts as regards the liaison of this article with Article 17(3) which requires an authorisation from the Commission as regards the use of other methods than those foreseen in this regulation. Clarification from the Commission is sought and welcomed.</p> <p>In certain cases (regional accuracy), model based estimations and not only sample based estimations should be accepted.</p>
<p>2. Member States shall provide the Commission (Eurostat) with detailed</p>	<p>2. Member States shall provide the Commission (Eurostat) with detailed</p>	

information on the sources and methods used.	information on the sources and methods used in accordance with the implementing regulation referred to in Article 7(3) .	A clarification whether the information to be provided within the quality reports foreseen in Article 12, should be provided. If yes, a reference to this article should be added. In addition a clarification whether this detailed information refers to metadata and quality reporting described in Article 12 or to additional information to be provided by Member States. If it refers to additional information, frequency and content of the detailed information should be specified.
<i>Article 9</i>		
<i>Periodicity of the data sets</i>	<i>“Periodicity and the first year of implementation of the data sets”</i>	The definition of the first year of implementation is an essential element. So it is proposed to change the title to
The periodicity of the data sets shall be as specified in Annex IV.	The periodicity and the first year of implementation of the data sets shall be as specified in Annex IV.	The definition of the first year of implementation is an essential element.
<i>Article 10</i>		
<i>Data transmission and deadlines</i>		
1. The transmission deadlines shall be as specified in Annex V.		Data transmission deadlines should take into account the period that is required for data collection and data processing. ICT transmission deadlines are fixed, but the data collection period is not fixed.

<p>2. For every data set, Member States shall transmit to the Commission (Eurostat) pre-checked microdata without direct identification.</p>	<p>2. For every data set, Member States shall transmit to the Commission (Eurostat) pre-checked microdata without direct identification anonymised records.</p>	
<p>3. By way of exception to paragraph 2, pre-checked aggregated data shall be transmitted for the compilation of monthly unemployment statistics.</p>	<p>3. By way of exception to paragraph 2, pre-checked aggregated data shall be transmitted for the compilation of monthly unemployment statistics.</p>	<p>It is proposed to delete the “aggregated” to be consistent with definitions in Art. 2(a)</p>
<p>4. Member States shall collect and transmit data according to this Regulation starting in 2019.</p>	<p>4. Member States shall collect and transmit data according to this Regulation starting in 2019 3 years after adoption of appropriate implementing and delegated acts.</p> <p><u>Alternative proposal 1:</u></p> <p>4. Member States shall collect and transmit data according to this Regulation starting in 2019 12 months after the entry into force of the present Regulation.</p>	<p>One MS needs about 3 years for preparing each survey according to new requirements based on IESS regulation and detailed implementing and delegated acts. This period of time is also necessary to implement all changes to Polish legal acts.</p> <p><u>2 MSs would prefer</u> that the starting point would be relative to entry into force of this regulation. Given a late date of adaption, changes might not be in place in 2019.</p> <p>2019 seems to be a too optimistic deadline. By the time of the data collection and production, the regulation as well as delegated and implementing acts should be implemented.</p> <p>As regards LFS for example, implementing acts are not expected to be available before the end of year 2017; according to the content of the acts, 3 years will be necessary to implement the new regulation and assess its impact on sensitive statistics.</p>

	<p><u>Alternative proposal 2:</u> 4. Member States shall collect and transmit data according to this Regulation starting in 2019 2021</p> <p><u>Alternative proposal 3:</u> 4. Member States shall collect and transmit aggregated data and anonymised records according to this Regulation starting in 2019.</p> <p><u>Alternative proposal 3:</u> 4. Member States shall collect and subsequently transmit data according to this Regulation starting in 2019.</p>	<p><u>2 MSs find the timetable rather ambitious</u> Today, 2019 does not seem feasible, taking into account the current late status of technical discussions prior to the definition of contents and criteria of implementation of data sets collection, and consequently of the preparation of implementing measures.</p> <p><u>1 MS proposes</u> the 2020 as starting year which will allow countries enough time to harmonize their surveys with IESS and implementing regulations.</p> <p>There is a view that the first reference year for each of the domains which do not have an annual periodicity should be explicitly laid down in the text, either in Article 10 or in Annex IV.</p>
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	<p style="text-align: center;"><i>Article 10a</i></p> <p style="text-align: center;"><i>Production of European Social Statistics.</i></p> <ol style="list-style-type: none"> 1. The Commission (Eurostat) shall produce European level social indicators and Member States shall produce European social statistics according to their respective sphere of competence, in accordance with Article 4 of Regulation (EC) 223/2009. 2. By way of exception paragraph 1, where European Social Statistics at the national or subnational level are to be produced by the Commission (Eurostat) from non-published national contributions, Article 16 of Regulation (EC) 223/2009 shall apply. 3. The quality criteria defined in Article 12(1) of Regulation (EC) No 223/2009 shall apply to the European social statistics and European level indicators produced under this article. 	<p>The quality criteria defined in Article 12(1) of Regulation (EC) No 223/2009 shall apply to the European social statistics and European level indicators produced under this article.</p>
<i>Article 11</i>		
<i>Sampling frames</i>		
<ol style="list-style-type: none"> 1. Data shall be based on representative samples drawn from sampling frames set up at national level that allow persons or households to be selected at random, with a known probability of selection. The sampling frames shall aim to cover exhaustively and exclusively the population of interest and 	<ol style="list-style-type: none"> 1. Data shall be based on representative samples drawn from sampling frames set up at national level that allow persons or households to be selected at random, with a known probability of selection. The sampling frames shall aim to cover exhaustively and exclusively the population 	<p>From a methodological point of view it is not necessary that the frame is exclusively for the</p>

<p>shall be regularly updated. They shall contain all the information necessary for the sample design, such as information needed for stratification purposes and for contacting the persons or households. The sampling frame shall also include the information needed to link persons to other administrative records, in so far as is allowed under data protection rules.</p>	<p>of interest and shall be regularly updated. They shall contain all the information necessary for the sample design, such as information needed for stratification purposes and for contacting the persons or households. The sampling frame shall also include the information needed to link persons to other administrative records in so far as is allowed under data protection rules.</p> <p><u>Alternative proposal:</u></p> <p>1. If data are collected through surveys, Ddata shall be based on representative samples drawn from sampling frames set up at national level that allow persons or households to be selected at random, with a known probability of selection. The sampling frames shall aim to cover exhaustively and exclusively the population of interest and shall be regularly updated. They shall contain all the information necessary for the sample design, such as information needed for stratification purposes and for contacting the persons or households. The sampling frame shall also include the information needed to link persons to other administrative records, in so far as is allowed under data protection rules.</p>	<p>population of interest.</p> <p>The text is redundant.</p> <p>Data may be based on surveys or on administrative registers. Therefore it is proposed to clarify that Article 11 relates to samples based on surveys.</p> <p>Please justify the modification of the text (“The sampling frames shall aim to cover exhaustively and exclusively the population of interest and</p>
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		<p>shall be regularly updated.”). We are of the opinion that over-coverage and even under-coverage is a general characteristic for each sampling frame.</p> <p>Please explain what “exhaustively and exclusively” mean. If this means that no coverage error is expected for the sampling frame, then we propose the change of text.</p> <p>For some surveys, especially TUS, HBS, a quota sampling can be more cost effective compared to probability sampling. The response burden for these two surveys is much higher than in other surveys, therefore the response rates of probability samples are very low (sampling bias). A weaker formulation here can at least lead to more cost effective surveys.</p>
2. When no such sampling frame is available in the Member State, other sampling frames that meet the following criteria shall be used. Such sampling frames shall:		
(a) identify the sample units, which can be persons, households, dwellings or addresses;	(a) identify the sample units, which can be persons, households, dwellings or addresses or geographic territories;	
(b) be able to provide the probability of selection;		
(c) be regularly updated.		
	2a. The use of small area estimations is authorised to secure the precision requirements, in the cases specified in	

	Annex II.	
3. The Commission shall be empowered to adopt implementing acts laying down uniform conditions for the sampling frames, notably setting out minimum requirements. These implementing acts shall be adopted in accordance with the examination procedure referred to in Article 16(2).	<p>3. These implementing acts shall be adopted in accordance with the examination procedure referred to in Article 16(2). By adaption of an implementing act the Commission shall aim at cost and burden neutrality or reduction.</p> <p><u>Alternative proposal:</u></p> <p>3. The Commission shall be empowered to adopt implementing acts laying down uniform conditions for the sampling frames, notably setting out minimum requirements. These implementing acts shall be adopted in accordance with the examination procedure referred to in Article 16(2).</p>	<p>This article should also include provisions concerning cost and burden.</p> <p>National statistical infrastructures differ considerably and uniform conditions for sampling frames is a very ambitious plan. The common requirements are already outlined in previous paragraphs of this article and can be made more specific further in technical specifications of data collections and their implementing regulations referred to in Article 3. It is questioned whether an extra piece of legislation in a form of a dedicated implementing regulation is justified.</p> <p>The scope of implementing powers is considered too wide. Sufficient coherence and comparability can be achieved outside legal basis by working together with Member States' experts and using guidelines and manuals.</p>
<i>Article 12</i>		
<i>Quality</i>		
1. Member States shall take the measures necessary to ensure the quality of the data and metadata transmitted.	1. Member States shall take the measures necessary to ensure the quality of the aggregated data, anonymised records, and	

	metadata transmitted.	
2. For the purpose of this Regulation, the quality criteria defined in Article 12(1) of Regulation (EC) No 223/2009 shall apply.	<p><u>Proposal is linked with the newly proposed Article 10a(3):</u> 2. For the purpose of this Regulation, the quality criteria defined in Article 12(1) of Regulation (EC) No 223/2009 shall apply.</p> <p><u>Alternative proposal:</u> 2. For the purpose of this Regulation, the quality criteria defined in Article 12(1) of Regulation (EC) No 223/2009 as amended by Regulation (EU) No 2015/759 shall apply.</p>	The quality criteria in Article 12(1) of Regulation (EC) No 223/2009 relate to statistics and other published estimates. As introduced by the Commission there are no statistics referred to in the proposal.
3. The Commission (Eurostat) shall assess the quality of the metadata on the specifications, of the data transmitted and of the sampling frames.		A clarification whether specifications for assessing quality of the metadata will be defined and whether these will be defined in accordance with the Article 6, should be provided.
4. For this purpose, Member States shall transmit, in respect of the data and microdata referred to in Article 10:		
(a) metadata describing the methodology used and how technical specifications were achieved by reference to those laid down by this Regulation;		
(b) information on compliance with the minimum requirements for the sampling frames used, including in developing and updating them, as laid down by this Regulation.		
5. Member States shall transmit the metadata and information referred to in paragraph 4	5. Member States shall transmit the metadata and information referred to in paragraph 4	

<p>by, at the latest, three months after the deadline for transmitting the data and microdata. This additional information shall be provided in the form of quality reports that demonstrate, in particular, how the data and microdata transmitted, and the metadata and information, meet the quality requirements.</p>	<p>by, at the latest, three months after the deadline for transmitting the aggregated data and anonymised records microdata. This additional information shall be provided in the form of quality reports that demonstrate, in particular, how the aggregated data and anonymised records microdata transmitted, and the metadata and information, meet the quality requirements.</p>	
<p>6. The Commission shall be empowered to adopt implementing acts specifying the modalities and content of the quality reports. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 16(2).</p>	<p>6. The Commission shall be empowered to adopt implementing acts specifying the modalities and content of the quality reports. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 16(2) and may not impose a significant additional burden or cost on the Member States.</p>	
<p>7. Member States shall inform the Commission (Eurostat) as soon as possible of any relevant information or change with regard to the implementation of this Regulation that would influence the quality of the data transmitted.</p>		
<p>8. At the request of the Commission (Eurostat), Member States shall provide the additional information necessary to evaluate the quality of the statistical information.</p>	<p>8. At the request of the Commission (Eurostat), Member States shall provide the additional information necessary to evaluate the quality of the statistical information, in so far as is allowed under data protection rules.</p> <p><u>Alternative proposal:</u> 8. At the request of the Commission (Eurostat),</p>	<p>This requirement could go beyond what is stated</p>

	Member States shall provide the additional information necessary to evaluate the quality of the statistical information.	in Reg. (EC) No 223/2009, Articles 12(2) and 12(3) on guaranteeing statistical quality. A more precise clarification what kind of additional information and on what level Member States are expected to provide, is requested. It should not increase the workload for the NSIs.
<i>Article 13</i>		
<i>Feasibility and pilot studies</i>		
In order to improve the data sets, the Commission (Eurostat) shall, where necessary, institute and Member States shall cooperate in several feasibility and pilot studies, in particular, to improve quality including comparability, to contribute to modernising the consumption and time use domains, to explore and implement new ways of improving responsiveness to users' needs, to better integrate the collection of data and the use of other data sources, and to make data collection in Member States more efficient, taking into account technological developments.	In order to improve the data sets, the Commission (Eurostat) shall, where necessary, institute and Member States shall may cooperate in several feasibility and pilot studies, in particular, to improve quality including comparability, to contribute to modernising the consumption and time use domains, to explore and implement new ways of improving responsiveness to users' needs, to better integrate the collection of data and the use of other data sources, and to make data collection in Member States more efficient, taking into account technological developments. <u>Alternative proposal 1:</u> In order to improve the data sets, the Commission (Eurostat) shall should , where necessary, institute and Member States shall should cooperate in several feasibility and pilot studies, in particular, to improve quality including comparability, to contribute to	<u>13 MSs oppose mandatory participation of the Member States in the feasibility and pilot studies.</u> Mandatory participation maybe costly and burdensome for the smaller Member States in particular. Participation in such studies should be voluntary for Member States.

	<p>modernising the consumption and time use domains, to explore and implement new ways of improving responsiveness to users' needs, to better integrate the collection of data and the use of other data sources, and to make data collection in Member States more efficient, taking into account technological developments.</p> <p><u>Alternative proposal 2:</u> In order to improve the data sets, the Commission (Eurostat) shall, where necessary, institute and Member States shall cooperate in several feasibility and pilot studies and Member States invited to participate on a voluntary basis, in particular, to improve quality including comparability, to contribute to modernising the consumption and time use domains, to explore and implement new ways of improving responsiveness to users' needs, to better integrate the collection of data and with the use of other data sources, and to make data collection in Member States more efficient, taking into account technological developments.</p> <p><u>Alternative proposal 3:</u> In order to improve the data sets, the Commission (Eurostat) shall, where necessary, institute propose several feasibility and pilot studies, which are carried out in cooperation with and Member States shall cooperate in several feasibility and pilot studies, in particular, to improve quality including comparability, to</p>	<p>Such studies should remain voluntary. The wording “Member States <i>shall</i> cooperate” indicates an obligation.</p> <p>The revised wording clarifies that participation in feasibility studies is not mandatory, but decided in agreement between the Commission and Member States. The provision for mandatory participation (“shall”) should be avoided as its implications are entirely unclear.</p>
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	<p>contribute to modernising the consumption and time use domains, to explore and implement new ways of improving responsiveness to users' needs, to better integrate the collection of data and the use of other data sources, and to make data collection in Member States more efficient, taking into account technological developments.</p> <p><u>Alternative proposal 4:</u> In order to improve the data sets, the Commission (Eurostat) shall, where necessary, institute and Member States shall have the possibility cooperate in several feasibility and pilot studies, in particular, to improve quality including comparability, to contribute to modernising the consumption and time use domains, to explore and implement new ways of improving responsiveness to users' needs, to better integrate the collection of data and the use of other data sources, and to make data collection in Member States more efficient, taking into account technological developments</p> <p><u>Alternative proposal 5:</u> In order to improve the data sets, the Commission (Eurostat) shall, where necessary, institute initiate and Member States shall cooperate on a voluntary basis in several feasibility and pilot studies, in particular, to improve quality including comparability, to contribute to modernising the consumption and time use domains, to explore and implement new ways of improving responsiveness to users'</p>	
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	<p>needs, to better integrate the collection of data and the use of other data sources, and to make data collection in Member States more efficient, taking into account technological developments.</p> <p><u>Alternative proposal 6:</u></p> <ol style="list-style-type: none"> 1. In order to improve the data sets, the Commission (Eurostat) may shall, where necessary, institute and Member States shall may cooperate in several feasibility and pilot studies, in particular, to improve quality including comparability, to contribute to modernising the consumption and time use domains, to explore and implement new ways of improving responsiveness to users' needs, to better integrate the collection of data and the use of other data sources, and to make data collection in Member States more efficient, taking into account technological developments. 2. When the number of Member States that volunteered to participate in a pilot study is not representative enough to reach an accurate result, the Commission is empowered to adopt implementing acts in order to launch the pilot study on a compulsory basis for all Member States. In this case, the Commission shall include the financing of this study in the implementing acts. <p><u>Alternative proposal 7:</u></p> <p>In order to improve the data sets, the</p>	
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	<p>Commission (Eurostat) shall may, where necessary, institute and Member States shall may cooperate in several feasibility and pilot studies; in particular, to improve quality, including comparability; to contribute to modernising the consumption and time use domain; to explore and implement new ways of improving responsiveness to users' needs; to better integrate the collection of data and the use of other data sources; and to make data collection in Member States more efficient, taking into account technological developments.</p>	<p>In case of a mandatory feasibility or pilot study, the Commission (Eurostat) shall provide the appropriate financing according to the rules set out in Article 14.</p> <p>Clarification is needed whether in this article, “feasibility” and “pilot” studies are used interchangeably. In research there is a difference between the two. Retention of one of the terms, e.g. “pilot” studies, would contribute to more clarity.</p> <p>Moreover, more explanation is needed as what would be expected from the Member States. The current wording gives one to understand that it would be obligatory on the Member States to participate in “several feasibility and pilot studies”. It should made clear on how many studies it means and what are the expenses. This article should be re-drafted keeping in view the resource constraints of Member States and to</p>
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		make. Also, it should be clarified what is the reason for the specific mentions of the consumption and time use domains in this article.
<i>Article 14</i>		
<i>Financing</i>		
1. For the implementation of this Regulation, the Union may provide grants to the national statistical institutes and other national authorities referred to in Article 5(2) of Regulation (EC) No 223/2009, for:	<p>1. For the implementation of this Regulation, the Union may shall provide grants to the national statistical institutes and other national authorities referred to in Article 5(2) of Regulation (EC) No 223/2009, for:</p> <p><u>Alternative proposal 1:</u></p> <p>1. For the implementation of this Regulation, the Union should take the necessary actions and find the right incentives, including financial support for, may provide grants to the national statistical institutes and other national authorities referred to in Article 5(2) of Regulation (EC) No 223/2009, for:</p> <p><u>Alternative proposal 2:</u></p> <p>1. For the implementation of this Regulation, the Union may provide grants to the national statistical institutes and other national authorities referred to in Article 5(2) of Regulation (EC) No 223/2009 as amended by Regulation (EU) No 2015/759, for:</p>	<p><u>6 MSs propose to oblige the Union to finance the activities linked with the implementation of the Regulation.</u></p> <p>At present, it is completely unclear for Member</p>

		<p>States whether funding through grants is available or may be available in the future. This is particularly the case for the years after 2020 under the new MFF. On the one hand the proposal sets a legal obligation for Member States to cooperate in feasibility and pilot studies, on the other hand there is uncertainty whether there will be a financial contribution from the Union. All aspects mentioned above create uncertainty for the Member States.</p> <p>Financial support should be continued for those domains receiving financial support from the Commission today, e.g. LFS.</p> <p>If the Commission intends to establish obligatory pilot and feasibility studies appropriate financing should be ensured correspondently. So the undertaking must be either forcing on both parts or voluntary for both parts.</p>
<p>(a) the development and/or implementation of data collections or data collection methods for social statistics, including sampling frames, during the first four years of the collection of the data sets ;</p>	<p>(a) the development and/or implementation of data collections or data collection methods designing sample surveys for the production of social statistics, including sampling frames, during the first four years of the collection of the data sets ;</p>	<p>As currently written – mentioning first four years of collection –, this item only applies to yearly data sets collections. Some clarification is needed for the criteria of application in case of supra annual data collections (e.g. EHIS). The first implementation of EHIS under this umbrella will be in 2025, what is more than four years after the</p>

		<p>adoption of the Regulation.</p> <p>Due to the need to maintain data quality and comparability over the time, the provision of this para is of very high importance, especially during the first years of data collection according to this regulation.</p>
(b) developing methodologies, including the feasibility and pilot studies referred to in Article 13;	<p><u>Proposal is linked with the alternative proposal 6 under Article 13:</u></p> <p>(b) developing methodologies, including the feasibility and pilot studies, taking into account the rules referred to in Article 13(2);</p>	
(c) collecting statistics on an ad-hoc subject required by the users as provided for in the Annex IV, new or revised sets of variables and characteristics implemented for the first time;	(c) collecting producing statistics on an ad-hoc subject required by the users as provided for in the Annex IV, new or revised sets of variables and characteristics implemented for the first time;	
	<p>2a. The Union may award grants, without a call for proposals to national statistical institutes and other national authorities. The grants may take the form of lump-sum payments and shall be made on condition that Member States actually participate in the actions referred to in Article 14(1).</p>	<p>Adding to the Article 14 provisions on the use of "lump sums" will allow for the implementation of a number of feasibility studies. Such proceedings of EC grants will reduce the burden associated with the implementation of grants and will allow for proper preparation of survey tools (currently too complex grant procedures limit participation in projects covered by the co-funding). The same solution was introduced in the LFS legislation.</p>

<p>2. The Union financial contribution shall be provided in accordance with Article 7 of Regulation (EU) No 99/2013 of the European Parliament and of the Council¹⁴, Article 16(1) (a) of Regulation (EU) No 1296/2013 of the European Parliament and of the Council¹⁵, Article 6 of Regulation (EU) No 1291/2013 of the European Parliament and of the Council¹⁶, Article 58 of Regulation 1303/2013 of the European Parliament and of the Council¹⁷, or Article 5 of Regulation (EU) No 282/2014 of the European Parliament and of the Council¹⁸.</p>	<p>2. The Union financial contribution shall be provided, depending on the nature of measures, in accordance with Article 7 of Regulation (EU) No 99/2013 of the European Parliament and of the Council¹⁴, Article 16(1) (a) of Regulation (EU) No 1296/2013 of the European Parliament and of the Council¹⁵, Article 6 of Regulation (EU) No 1291/2013 of the European Parliament and of the Council¹⁶, Article 58 of Regulation 1303/2013 of the European Parliament and of the Council¹⁷, or Article 5 of Regulation (EU) No 282/2014 of the European Parliament and of the Council¹⁸.</p>	
<p>3. This Union financial contribution shall not exceed 90% of the eligible costs.</p>		

¹⁴ Regulation (EU) No 99/2013 of the European Parliament and of the Council of 15 January 2013 on the European statistical programme 2013-17 (OJ L 39, 9.2.2013, p. 12).

¹⁵ Regulation (EU) No 1296/2013 of the European Parliament and of the Council of 11 December 2013 on a European Union Programme for Employment and Social Innovation ("EaSI") and amending Decision No 283/2010/EU establishing a European Progress Microfinance Facility for employment and social inclusion (OJ L 347, 20.12.2013, p. 238)

¹⁶ Regulation (EU) No 1291/2013 of the European Parliament and of the Council of 11 December 2013 establishing Horizon 2020 - the Framework Programme for Research and Innovation (2014-2020) and repealing Decision No 1982/2006/EC (OJ L 347, 20.12.2013, p. 104).

¹⁷ Regulation (EU) No 1303/2013 of the European Parliament and the Council of 17 December 2013 laying down common provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund, the European Agricultural Fund for Rural Development and the European Maritime and Fisheries Fund and laying down general provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund and the European Maritime and Fisheries Fund and repealing Council Regulation (EC) No 1083/2006(OJ L 347, 20.12.2013, p. 320).

¹⁸ Regulation (EU) No 282/2014 of the European Parliament and of the Council of 11 March 2014 on the establishment of a third Programme for the Union's action in the field of health (2014-2020) and repealing Decision No 1350/2007/EC (OJ L 86, 21.3.2014, p. 1).

<i>Article 15</i>		<u>3 MSs oppose fully the use of the delegated acts.</u>
<i>Exercise of the delegation</i>		It is proposed to bring Article in line with the wording that has been agreed on in previous statistical regulations.
1. The power to adopt delegated acts is conferred on the Commission subject to the conditions laid down in this Article.		
2. The power to adopt delegated acts referred to in Articles 3(4) and 4(1) shall be conferred on the Commission for an indeterminate period of time from [Publications Office: please insert exact date of entry into force of the Regulation].	<p>2. The power to adopt delegated acts referred to in Articles 3(4) and 4(1) shall be conferred on the Commission for a an indeterminate period of time five years from [Publications Office: please insert exact date of entry into force of the Regulation].</p> <p><u>Alternative proposal 1:</u></p> <p>2. The power to adopt delegated acts referred to in Articles 3(4) and 4(1) shall be conferred on the Commission for an indeterminate period of time a period of five years from [Publications Office: please insert exact date of entry into force of the Regulation]. The Commission shall draw up a report in respect of the delegation of power not later than nine months before the end of the five-year period. The delegation of power shall be tacitly extended for periods of an identical duration, unless the European Parliament or the Council opposes such extension not later than three months before the end of each period.</p>	<p><u>18 MSs propose to limit the delegation of the power for 5 years.</u></p> <p>According to the Article 290 of the TFEU the duration of the delegation of power shall be explicitly defined in the legislative act.</p> <p><u>7 MSs propose the reporting obligation of the Commission in respect of the delegation of power.</u></p> <p>The power conferred on the Commission connected with establishing delegated acts should be reviewed and the Commission periodically ought to present the report to the legislators on actions carried out. The Commission's actions may involve an increase in burden for countries, therefore, the mandate given to the Commission should be limited to a definite period of time.</p> <p>In addition, taking into account extended scope of powers delegated to the Commission as well as novelty of the legal architecture the Legislator should have an opportunity to assess periodically</p>

	<p><u>Alternative proposal 2:</u></p> <p>2. The power to adopt delegated acts referred to in Articles 3(4) and 4(1) shall be conferred on the Commission for a period of five years from an indeterminate period of time from <i>[Publications Office: please insert exact date of entry into force of the Regulation]. [date of entry into force of the basic legislative act or any other date set by the co-legislators]</i>. The Commission shall draw up a report in respect of the delegation of power not later than nine months before the end of the five-year period. The delegation of power shall be tacitly extended for periods of an identical duration, unless the European Parliament or the Council opposes such extension not later than three months before the end of each period.</p> <p><u>Alternative proposal 3:</u></p> <p>2. The power to adopt delegated acts referred to in Articles 3(4) and 4(1) shall be conferred on the Commission for an indeterminate a period of time—5 years from <i>[Publications Office: please insert exact date of entry into force of the Regulation]</i>. The Commission shall draw up a report in respect of the delegation of power not later than nine months before the end of the 5 year period. The delegation of power shall be tacitly extended for periods of an identical</p>	<p>the execution of delegated powers</p> <p>A time limit for the delegation (sunset clause) and reporting requirements by the Commission should be introduced. A burden and production costs analysis should be done in the run-up of the adoption of the delegated act, if appropriate.</p>
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	<p>duration, unless the European Parliament or the Council opposes such extension not later than 3 months before the end of each period.</p> <p>In addition, the Commission shall duly justify the actions provided for in those delegated acts, conducting where appropriate cost-effectiveness analysis, including an assessment of the burden on respondents and of the production costs in accordance with Article 14(3) of Regulation (EC) No 223/2009.</p>	
<p>3. The delegation of power referred to in Articles 3(4) and 4(1) may be revoked at any time by the European Parliament or by the Council. A decision to revoke shall put an end to the delegation of the power specified in that decision. It shall take effect on the day following the publication of the decision in the Official Journal of the European Union or at a later date specified therein. It shall not affect the validity of any delegated acts already in force.</p>		
<p>4. Before adopting a delegated act, the Commission shall consult experts designated by each Member State in accordance with the principles laid down in the Interinstitutional Agreement on Better Law-Making of 13 April 2016¹⁹.</p>		

¹⁹ OJ L 123, 12.5.2016, p. 1.

5. As soon as it adopts a delegated act, the Commission shall notify it simultaneously to the European Parliament and to the Council.		
6. A delegated act adopted pursuant to Articles 3(4) and 4(1) shall enter into force only if no objection has been expressed either by the European Parliament or by the Council within a period of two months of notification of that act to the European Parliament and the Council or if, before the expiry of that period, the European Parliament and the Council have both informed the Commission that they will not object. That period shall be extended by two months at the initiative of the European Parliament or the Council.	6. A delegated act adopted pursuant to Articles 3(4) and 4(1) shall enter into force only if no objection has been expressed either by the European Parliament or by the Council within a period of two three months of notification of that act to the European Parliament and the Council or if, before the expiry of that period, the European Parliament and the Council have both informed the Commission that they will not object. That period shall be extended by two months at the initiative of the European Parliament or the Council.	<u>3 MSs propose to extend the period for objection from 2 to 3 months.</u>
<i>Article 16</i>		
<i>Committee procedure</i>		
1. The Commission shall be assisted by the European Statistical System Committee established by Regulation (EC) No 223/2009. That committee shall be a committee within the meaning of Regulation (EU) No 182/2011.		
2. Where reference is made to this paragraph, Article 5 of Regulation (EU) No 182/2011 shall apply.		

	<p>3. Where the Committee delivers no opinion, the Commission shall not adopt the draft implementing act and the third subparagraph of Article 5 of Regulation (EU) No 182/2011 shall apply.</p>	<p>10 MSs propose “no opinion” clause.</p> <p>The Interinstitutional Agreement (IIA) does not allow the legislator to add additional procedural requirements in Union legislation which would alter the mechanisms for control set out in Regulation (EU) 182/2011. Therefore, under these conditions it would not legally be feasible to include additional safeguard provisions for Member States if the legislator decides to empower the Commission to adopt implementing acts.</p> <p>The current proposal consists of a number of measures which empower the Commission to adopt implementing acts. Those acts potentially have far-reaching consequences in terms of initial development and structural implementation costs for Member States as well as burden on respondents. In this respect additional safeguards for Member States are justified.</p> <p>The only possible option is to include the no-opinion clause, because this is an element of the existing legal framework regulated in “Comitology Regulation (EU) 182/2011”.</p> <p>Whether or not the ‘no opinion-clause’ should be included in the regulation will depend on the final decision on which elements should be dealt with in implementing acts. With the current proposal, the implications of the implementing acts regarding e.g. variables, classifications etc. are potentially far reaching and therefore the no</p>
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		opinion clause should apply.
<i>Article 17</i>		
<i>Derogations</i>		
<p>1. If applying this Regulation, or the implementing measures and delegated acts adopted under it, in a Member State's national statistical system would necessitate major adaptations, the Commission may grant, by means of implementing acts, a derogation for up to three years. A derogation may only be granted if it will not compromise the comparability of Member States' data relating to headline indicators, or hamper the calculation of the required timely and representative European aggregates.</p>	<p>1. If applying this Regulation, or the implementing measures and delegated acts adopted under it, in a Member State's national statistical system would necessitate major adaptations, the Commission may grant, by means of implementing acts, a derogation for up to three years. A derogation may only be granted if it will not compromise the comparability of Member States' data relating to headline indicators, or hamper the calculation of the required timely and representative European aggregates.</p> <p><u>Alternative proposal 1:</u></p> <p>1. If applying this Regulation, or the implementing measures and delegated acts adopted under it, in a Member State's national statistical system would necessitate major adaptations, the Commission may grant, by means of implementing acts, a derogation for up to three years. A derogation may only be granted if it will not compromise the comparability of Member States' data relating</p>	<p><u>4 MSs propose to delete the condition for granting derogation.</u></p> <p>Given the fact that this Regulation implements broad changes to the methodology and survey organization their proper implementation requires adequate time.</p> <p>Derogations may be necessary also for headline indicators and European aggregates. Headline indicators may also change over time.</p> <p>To introduce this sentence is the same as to leave without effect the derogation (all derogation affects for a while the comparability of the data), and goes against the spirit of a derogation, especially when this is a facultative power of the Commission. Including it is a dangerous precedent.</p>

	<p>to headline indicators, or hamper the calculation of the required timely and representative European aggregates.</p> <p><u>Alternative proposal 2:</u></p> <p>1. If applying this Regulation, or the implementing measures and delegated acts adopted under it, in a Member State's national statistical system would necessitate major adaptations, the Commission may grant, by means of implementing acts, a derogation for up to three four years. A derogation may only be granted if it will not compromise the comparability of Member States' data relating to headline indicators European social statistics, or hamper the calculation of the required timely and representative European level indicators.</p> <p><u>Alternative proposal 3:</u></p> <p>1. The Commission may adopt implementing acts granting derogations, for up to three years, from specific obligations for which the application of this Regulation or the implementing measures and delegated acts adopted under it would necessitate major adaptation in a Member State's national statistical system ...</p> <p>1a. For the purposes of paragraph 1, the Member States concerned shall submit a duly reasoned request to the Commission no later than ...</p>	
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<p>2. Where a derogation is still justified at the end of the period for which it was granted, the Commission may grant a subsequent derogation for a maximum period of three years, by means of implementing acts.</p>		
<p>3. When the only means by which a Member State can provide the required data sets is by using methods other than those laid down in this Regulation, or in the implementing measures and delegated acts adopted under it, the Commission may exceptionally authorise the use of such methods for a maximum duration of five years, by means of implementing acts.</p>	<p>3. When the only means by which a Member State can provide the required data sets is by using methods other than those laid down in this Regulation, or in the implementing measures and delegated acts adopted under it, the Commission may exceptionally authorise the use of such methods for a maximum duration of five years, by means of implementing acts.</p> <p><u>Alternative proposal:</u></p> <p>3. When the only means by which a Member State can provide the required aggregated data sets or anonymised records is by using methods other than those laid down in this Regulation, or in the implementing measures and delegated acts adopted under it, the Commission may exceptionally authorise the use of such methods for a maximum duration of five years, by means of implementing acts.</p>	<p>There are doubts as regards the liaison of Article 8(1)(b) with Article 17(3) which requires an authorisation from the Commission as regards the use of other methods than those foreseen in this regulation. A clarification from the Commission would be welcomed.</p>

<p>4. Where the authorisation is still justified at the end of the period for which it was granted, the Commission may grant a subsequent authorisation for a maximum period of five years, by means of implementing acts.</p>		
<p>5. For the purposes of paragraphs 1 to 4, the Member State shall submit a duly justified request to the Commission within three months of the date of the entry into force of the act concerned, or six months before the end of the period for which the current derogation or authorisation has been granted. When requesting the authorisation referred to in paragraphs 3 and 4, the Member State concerned shall describe in detail the methods used and demonstrate that they lead to comparable results.</p>	<p>5. For the purposes of paragraphs 1 to 4, the Member State shall submit a duly justified request to the Commission within three months of the date of the entry into force of the act concerned, or six months before the end of the period for which the current derogation or authorisation has been granted. When requesting the authorisation referred to in paragraphs 3 and 4, the Member State concerned shall describe in detail the methods used and demonstrate that they lead to comparable European social statistics and European level indicators.</p>	<p>The phrase “...within three months of the date of the entry into force of the act concerned ...” is not clear enough. The Commission is requested to make more explicit the time period within which Member States are expected to submit requests for derogations, especially for those domains that do not have an annual periodicity, whose implementation is foreseen later than in the year in which the Regulation enters into force.</p>

6. The Commission shall adopt those implementing acts in accordance with the examination procedure referred to in Article 16(2).		
		It is suggested to add an article foreseeing the submission, within a certain time and then periodically (e.g. 5 years), of a report from the Commission to the EP and to the Council on the implementation of this regulation.
<i>Article 18</i>		
<i>Repeal</i>		
1. Regulations (EC) No 577/98 and (EC) No 1177/2003 shall be repealed with effect from 31 December 2018. The requirements set out in these Regulations concerning the transmission of data and metadata, including quality reports, shall continue to apply for the reference periods prior to their repeal.	1. Regulations (EC) No 577/98 as amended by Regulation (EU) No 545/2014 and (EC) No 1177/2003 shall be repealed with effect from 31 December 2018 from the implementation date of appropriate delegated and implementing acts concerning "labour market" and "income and living conditions" domains. The requirements set out in these Regulations concerning the transmission of data and metadata, including quality reports, shall continue to apply for the reference periods prior to their repeal.	The proposal sets up a framework regulation for European statistics relating to persons and households based on data at individual level collected from samples. There are currently five legal bases for conducting European social surveys, which relate respectively to the Labour

		<p>Force Survey (LFS), European Statistics on Income and Living Conditions (EU-SILC), the Adult Education Survey (AES), the European Health Interview Survey (EHIS) and the Survey on Information and Communications Technologies (ICT) usage in households (ICT-HH). The aforementioned domains which are currently covered by these separate regulations will be integrated in the new framework regulation (the proposal).</p> <p>In addition it is necessary to include a provision that regulates that the Commission regulations adopted on the basis of the repealed basic acts shall remain applicable for a transitional period. The transitional period shall end on the date of application of the implementing acts first adopted on the basis of articles referring to implementing acts of this regulation, which shall be the same date for all of those implementing acts.</p>
<p>2. References to the repealed Regulations shall be construed as references to this Regulation.</p>		

	<p style="text-align: center;"><i>Article 18a</i></p> <ol style="list-style-type: none"> 1. Regulation (EC) No 1338/2008 of the European Parliament and of the Council on Community statistics on public health and health and safety at work shall be amended with effect from 31 December 2018 as follows: [...]. 2. Regulation (EC) No 452/2008 of the European Parliament and of the Council concerning the production and development of statistics on education and lifelong learning shall be amended with effect from 31 December 2018 as follows: [...]. 3. Regulation (EC) No 808/2004 of the European Parliament and of the Council concerning Community statistics on the information society [ANNEX II Module 2: Individuals, households and the information society] shall be amended with effect from 31 December 2018: [...] 4. The requirements set out in the repealed parts of these Regulations concerning the transmission of data and metadata, including quality reports, shall continue to apply for the reference periods prior to their repeal. References to the repealed parts of the Regulation shall be construed as references to this Regulation. 	<p>Article 18 regulates the repeal of only Regulations (EC) No 577/98 and (EC) No 1177/2003, but makes no mention of the parts of Regulations (EC) No 452/2008, (EC) No 1338/2008 and (EC) No 808/2004 that are rendered redundant by the proposal.</p> <p>In order to avoid confusion it is suggested that an additional provision be included in the enacting terms of this regulation. This provision should regulate that transmission by Member States of data to the Commission (Eurostat) under the following components is no longer obligatory:</p> <ul style="list-style-type: none"> - Domains 2 and 3 of the Annex to of Regulation (EC) No 452/2008 concerning the production and development of statistics on education and lifelong learning, as well as all references to these Domains in the text of the Regulation; - Annex I of Regulation (EC) No 1338/2008 on Community statistics on public health and health and safety at work, as well as all references to this Annex in the text of the Regulation; - Annex II of Regulation (EC) No 808/2004 concerning Community statistics on the information society, as well as all references to this Annex in the text of the Regulation.
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<i>Article 19</i>		
<i>Entry into force</i>		
1. This Regulation shall enter into force on the twentieth day following that of its publication in the Official Journal of the European Union.		
2. It shall apply from 1 January 2025 in respect of the domains set out under Article 3(1)(f) and (g).		<p>A clarification in which year the first HBS and TUS has to be carried out, whether TUS and HBS may be part of the Multiannual planning the earliest for the year 2027.</p> <p>It seems premature to draw up legislation which will not enter into force until almost 10 years from now.</p>
This Regulation shall be binding in its entirety and directly applicable in all Member States.		
Done at Brussels,		

Topics to be covered

Domain	Topic	Detailed topics	MSs' comments, proposals and justification
For all domains	Technical items	Data collection information	
		Identification	
		Weights	
		Interview characteristics	
		Localisation	
	Person and household characteristics	Demography	
		Citizenship and migrant background	
		Household composition	
	Labour market participation	Main activity status (self-defined)	
		Elementary job characteristics	
Educational attainment and background	Educational attainment level		
Labour market	Person and household characteristics	Household composition – details	<p><u>1 MS opposes this detailed topic.</u> The reference to household composition under “For all domains” is enough and the implementation for different surveys is under negotiation at expert level.</p> <p>Another MS considers it not necessary, given that this detailed topic is for all domains and its level of detail is established in the definition of the standardized social variables. This detailed topic was not included in previous versions of the Regulation and it has not been agreed by the working groups of experts).</p>

		Duration of stay in the country	
	Labour market participation	Employment status	
		Professional status	
		Occupation	
		Economic activity	
		Duration of contract	This detailed topic were not included in previous versions of the Regulation and it has not been agreed by the working groups of experts. Its content is unknown.
		Duration of contract – secondary information	
		Full- or part-time status - reason	
		Dependent self-employment	
		Supervisory responsibilities	
		Establishment size	
		Workplace	
		Working at home	
		Search for work	
		Willingness to work	
		Availability	
		Second job	
		Search for another job	
		Reconciliation between work and family life	
		Young people on the labour market	
		Labour market situation of migrants and their immediate descendants	
Transition into retirement			
Care needs			

	Job tenure and previous work experience	Start of job	
		Way job found	
		Previous work experience	
	Working conditions including working hours and working time arrangements	Working hours	
		Working time arrangements	
		Work organisation and working time arrangements	
	Educational attainment and background	Educational attainment - details	
	Participation in education and training	Participation in formal and non-formal education and training (4 weeks)	
		Participation in formal and non-formal education and training (12 months)	
	Health: status and disability, care and determinants	Accidents at work and other work-related health problems	
Minimum European Health Module		Health status and disability: One MS considers that the question chronic morbidity is disproportionate in relation with the aim of the Labour Force Survey. They could accept the inclusion of some questions about the self-perceived health and activity limitations. It is proposed to replace the words “Minimum European Health Module” with the words “Health status and disability”	
Income, consumption and wealth, including debts	Income from work		
Income and living conditions	Person and household characteristics	Household composition – details	1 MS opposes this detailed topic. The reference to household composition under “For all domains” is enough and the implementation for different surveys is under negotiation at expert level.

		Duration of stay in the country	
	Participation in education and training	Participation in formal education activities (current)	
	Educational attainment and background	Educational attainment - details	
	Labour market participation	Characteristics of the workplace	
		Duration of contract	
		Employment status	
		Detailed labour market situation	
		Supervisory responsibilities	
	Job tenure and previous work experience	Previous work experience	
	Working conditions including working hours and working time arrangements	Calendar of activities	
		Working hours	
	Health: status and disability, care and determinants	Minimum European Health Module	
		Health status and disability	
		Children health	
		Access to health care	
		Health care	
		Access to health care (children)	
		Health determinants	
	Quality of life, including social and cultural participation and	Quality of life	
		Social and cultural participation	

	wellbeing	Well-being	
	Living conditions, including material deprivation, housing, living environment, access to services	Material deprivation	
		Child deprivation	
		Main housing characteristics	
		Housing conditions details, incl. deprivation	
		Housing costs including imputed rent	
		Living environment	
		Use of services, including care services	
		Affordability	
		Unmet needs and reasons	
		Childcare	
	Income, consumption and wealth, including debts	Income from work	
		Income from allowances	
		Income from pensions	
		Other incomes	
		Taxes and contributions	
		Total income	
		Over-indebtedness	
		Arrears	
		<u>Wealth</u>	<p><u>3 MSs do not support covering the detailed topics of “Wealth” under the Income and Living Conditions domain.</u></p> <p>In order to accurately measure household wealth a dedicated survey is required. The current proposal overloads the SILC survey and jeopardises the quality and response rates.</p>

			Including topic of wealth in the income and living conditions survey is not decided either, an impact assessment is needed.
		Main consumption components	1 MS does not support covering the detailed topics of “Consumption” under the Income and Living Conditions domain.
		Intergenerational transmission of disadvantages	
Health	Health: status and disability, care and determinants	Minimum European Health Module	
		Diseases and chronic conditions	
		Accidents and injuries	
		Pain	
		Mental health	
		Functional limitations	
		Difficulties in personal care activities	
		Difficulties in household activities	
		Temporary limitation in activity (due to health problems)	
		Barriers to participation in specific life domains	
		Use of health and long-term care	
		Medicine use	
		Preventive care	
		Access to health care	
		Height and weight	
		Physical activity	
Nutritional habits			
Smoking			

		Alcohol consumption	
		Social and environmental factors	
	Income, consumption and wealth, including debts	Total income	
Education and training	Person and household characteristics	Duration of stay in the country	
	Job tenure and previous work experience	Start of job	
	Labour market participation	Establishment size	
	Educational attainment and background	Educational attainment - details	
		Educational background	
		Self-reported skills	
	Participation in education and training	Access to information on learning possibilities and guidance (12 months)	
		Participation in formal education activities (12 months)	
		Most recent formal education activity - details (12 months)	
		Use of ICT in most recent formal education (12 months)	
		Reasons for participating in most recent formal education (12 months)	
		Payment and hours of most recent formal education (12 months)	
		Outcomes and use of skills from most recent formal education (12 months)	
Participation in non-formal education activities (12 months)			
Non-formal education activities - details (12 months)			

		Use of ICT in non-formal education activities (12 months)	
		Reasons for participating in non-formal education activities (12 months)	
		Payment and hours of non-formal education activities (12 months)	
		Outcomes and use of skills from non-formal education activities (12 months)	
		Obstacles to participation in education and training (12 months)	
		Informal learning	
	Income, consumption and wealth, including debts	Total income	
Use of information and communication technologies	Information society participation	Access to ICT	
		Use and frequency of use of ICT	
		Barriers and problems to use	
		Effect of use	
		Security, privacy, trust	
		Connection to the internet from anywhere	
		Digital Skills	
		Internet activities	
		e-Commerce	
		Interaction with public authorities	
		Income, consumption and wealth, including debts	Total income

<p><u>Time use</u></p>			<p><u>3 MSs propose deletion of this domain</u></p> <p>In case of time-use survey the topics that are not in close connection with it and not adopted are listed (health, living conditions, working conditions, income, consumption, wealth), an impact assessment is needed.</p> <p>For the time use survey the response burden is already very high and new topics like health (including disability), living conditions (including material deprivation), housing, living environment, access to services, production for self-consumption and sell, reparations shouldn't be added. This would go against the promise in the lead text of the regulation to take into account the response burden.</p> <p>Furthermore the quality of the data "place of activity" and "assessment of activity" is insufficient because the rate of item non-response is very high. The variable assessment of activity does not deliver serious data.</p> <p>Moreover these data do not reflect political needs.</p>
	<p>Person and household characteristics</p>	<p>Household composition - details</p>	
	<p>Participation in education and training</p>	<p>Participation in formal education activities (current)</p>	
	<p>Health: status and disability, care and determinants</p>	<p>Minimum European Health Module</p>	<p>The MEHM consists of 3 questions. It was not agreed at DSS level to include 3 additional health questions in the LFS.</p> <p>Health status and disability: One MS considers that the question chronic morbidity is disproportionate in relation with the aim of the Time-Use Survey. They could accept the inclusion of some questions about the self-</p>

			perceived health and activity limitations
Living conditions, including material deprivation, housing, living environment, access to services	Possession of durable goods		It is proposed to move the detailed topic to Consumption\Living conditions, including material deprivation, housing, living environment, access to services
	Childcare		
	Care for sick and elderly		
Working conditions including working hours and working time arrangements	Working hours		
	Working time arrangements		
Income, consumption and wealth, including debts	Production for self-consumption and sell, reparations		
	Income from work		
	Total income		
Allocation of time			<u>1 MS suggests</u> to consider dropping the allocation of time from the current regulation proposal.
	Time use, types of activities		
	Parallel activities		
	Place of activity		
	Presence of others during the activity		
	Assessment of activity		

Consumption			<p><u>1 MS opposes the inclusion of questions on wealth in the HBS survey.</u></p> <p>In order to accurately measure household wealth a dedicated survey is required. The current proposal overloads the HBS survey and jeopardises the quality and response rates.</p> <p>The outlined content of proposed domains is very ambitious in its scope. This applies in particular to the consumption domain, which goes in its proposed scope far beyond the current content of the HBS, but also the list of proposed topics to be covered for other domains is very wide – also taking in mind the space needed for the foreseen ad-hoc policy needs modules. This is likely to result in a high response burden extensive data collections.</p>
	Person and household characteristics	Household composition - details	
	Living conditions, including material deprivation, housing, living environment, access to services	Main housing characteristics	
		Possession of durable goods	It is proposed to move the detailed topics from Time use\Living conditions, including material deprivation, housing, living environment, access to services
	Participation in education and training	Participation in formal education activities (current)	
	Labour market participation	Duration of contract	
	Income, consumption and wealth, including debts	Total income	Consumption domain should be strictly focused on consumption and consumption related topics since the response burden of the HBS is already very high. Some detailed topics like arrears, debts and own consumption are problematic to ask in a household survey. It is known by experience that it is not possible to collect reliable data on

		<p>income, consumption and wealth in one survey (not only because of the absence of rich households in the sample).</p> <p>Compared to the last draft regulation there are even three more topics in this domain (person and household characteristics; living conditions, including material deprivation, housing, living environment, access to services; labour market participation).</p>
		Taxes and contributions
		Income in kind from non-salaried activities
		Imputed rent
		Main source of income
		Wealth
		Debts
		Arrears
		Consumption by COICOP
		Cross border consumption expenditures by COICOP
		Own consumption

Precision requirements

COM proposal	MSs' proposals for wording	MSs' comments & justification
<p>1. Precision requirements for all data sets are expressed in standard errors and are defined as continuous functions of the actual estimates and of the size of the statistical population in a country or in a NUTS 2 region.</p>		<p>In general, it is important that the precision requirements only relate to the size of the standard error and not to the methodology for calculating the standard error</p> <p>The new precision requirements are based on the standard error on personal level but in the formula the household size is relevant – it is suggested to define the precision requirements on personal level.</p> <p>Clarifications at technical level (e.g. the use of calibration methods for reducing the standard errors) in the different domains are still necessary.</p>
<p>2. The estimated standard error of a particular estimate $\widehat{SE}(\hat{p})$ shall not be bigger than the following amount:</p> $\sqrt{\frac{\hat{p}(1-\hat{p})}{f(N)}}$		
<p>3. The function $f(N)$ shall have the form of $f(N)=a\sqrt{N+b}$</p>		

4. The following values for parameters N , a and b shall be used.

Please justify how the table content (parameters) was estimated. The precision requirements have been discussed many times before but it is unclear how the final parameter values were agreed on. Please explain this in detail for each domain. It would be appreciated if a working document could be prepared by the Commission (Eurostat) explaining in detail how the precision requirements laid down in Annex II were computed.

In order to increase comparability the standardization of starting age, i.e. 16 years, for most domains is proposed. As a consequence the precision requirements for labour market domain, health domain and time use domain should be respectively changed.

\hat{p}	N	a	b
Labour market domain: precision requirements			
Estimated (national) quarterly unemployment-to-population 15-74 ratio	Country population aged 15-74 residing in private households, in million persons and rounded to 3 decimal digits	7800	-4500
Estimated (national) quarterly employment-to-population 15-74 ratio	Country population aged 15-74 residing in private households, in million persons and rounded to 3	7800	-4500

	decimal digits		
Estimated quarterly unemployment-to-population 15-74 ratio in each NUTS 2 region	Population aged 15-74 in the NUTS 2 region residing in private households, in million persons and rounded to 3 decimal digits	See paragraph 6	
Income and living conditions domain			
Ratio at-risk-of-poverty or social exclusion to population	Number of private households in the country in millions and rounded to 3 decimal digits	900	2600
Ratio of at-persistent-risk-of-poverty over four years to population	Number of private households in the country in millions and rounded to 3 decimal digits	350	1000
Ratio at-risk-of-poverty or social exclusion to population in each NUTS 2 region (see paragraph 7)	Number of private households in the NUTS 2 region in millions and rounded to 3 decimal digits	600	0
Health domain			
Percentage of population severely limited in usual activities because of health problems (age 15 years or over)	Country population aged 15 years or over residing in private households, in million persons and rounded to 3 decimal digits	1200	2800

In precision requirements in the domain 'income and living condition' the population size is measured in terms of households. It is strange, partly because the requirements refer to an estimate defined in the population of individuals. On the other hand, the estimate of number of households in the country is less precise than the one of population. Besides, it is hardly acceptable that

- a. for two countries with the same population size and poverty there may be two different precision requirements depending on the number of households;
- b. the precision requirements may be getting more and more demanding in the course of time given an increasing number of overall household even if the population size decreases (in terms of individuals).

It should be clarified why for the Income and Living Conditions domain N refers to households whereas "p" refers to persons.

Education and Training domain			
Participation rate in formal education and training (age 18-24)	Country population aged 18-24 residing in private households, in million persons and rounded to 3 decimal digits	200	1500
Participation rate in non-formal education and training (age 25-69)	Country population aged 25-69 residing in private households, in million persons and rounded to 3 decimal digits	400	2000
Use of information and communication technology domain			
Percentage of individuals who ordered goods or services over the Internet for	Country population aged 16-74 residing in private households, in million persons and rounded to 3 decimal digits	400	1300

1 MS opposes the extension of the population with the age-groups 18-24 and 65-69 in “Education and Training domain\Participation rate in formal education and training”. For the population aged 18-24. MS can agree if data from administrative registers could be used for formal education and other variables are optional.

It is essential to reconsider the area “Education and training domain”. The proposed effective sample sizes f(N) for age groups 18-24 and 25-74 are not in line: f(N) for age group 18-24 is much larger at least relative to the population 18-24 than the one for 25-74.

For Member States that uses a frame of dwellings/households the age group 18-24 is a rather small unplanned domain. According to the Handbook on Precision Requirements and Variance Estimation for ESS Household Surveys, it should be avoided to set up precision requirements for unplanned domains.

Target population for the ICT was 16-74. The current table defines age 15+. A clarification what is the reason for the difference, is requested.

1 MS proposes to maintain the currently existing precision requirements. Changes in

private use in the last year					
Time use domain					
Percentage of population aged 15 and over spending daily on average more than 10% of time working in paid work	Country population aged 15 years or over residing in private households, in million persons and rounded to 3 decimal digits	900	3500		
Consumption domain					
Percentage of households whose expenditure on housing-related categories including water, electricity, gas and other fuels, are more than 50% of the total expenditure (See paragraph 8)	Number of private households in the country, in millions and rounded to 3 decimal digits	900	2600		
5. Should countries obtain negative $f(N)$ values with the parameters expressed above, they will be exempted from the corresponding requirement.					
				precision requirements cause an increase in the sample of ICT-HH, and as a consequence - an increase in the costs, which could be disproportionately high comparing to benefits for the quality of survey.	
				<u>1 MS proposes</u> to remove the suggested precision requirements for TUS. They would increase the sample sizes significantly. This would increase the cost for the survey a lot.	
				<u>1 MS proposes</u> to remove the suggested precision requirements for HBS. They would increase the sample sizes for HBS significantly. This would increase the cost for the survey a lot.	
				For the reasons described for the “Income and living condition domain”, setting the precision requirement for households could also be problematic in Consumption domain.	

<p>6. For the estimated unemployment-to-population 15-74 ratio in each NUTS 2 region, the function $f(N)$ is defined as follows:</p> $f(N_{r,15-74}) = \begin{cases} 1300, & \text{if } N_{r,15-74} \geq 0.300 \text{ million inhabitants} \\ \frac{1300}{0.3} N_{r,15-74}, & \text{if } N_{r,15-74} < 0.300 \text{ million inhabitants} \end{cases}$		<p>Only systematic deviations of the precision requirements will be considered non-compliances at NUTS2 level (see comments on Article 6(1)(e)).</p>
<p>7. For the estimated ratio at-risk-of-poverty or social exclusion to population in each NUTS 2 region, these requirements are not compulsory for NUTS 2 regions with less than 0.500 million inhabitants, provided that the corresponding NUTS 1 region complies with this requirement.</p>		
<p>8. For the consumption domain, the precision requirements may be reached by combining microdata concerning a maximum of three successive years of observations.</p>		

Sample characteristics

COM proposal	MSs' proposals for wording	MSs' comments and justification
1. Sample characteristics of the Labour Market domain shall include:		
(a) The national sample for the reference quarter (aggregation of consecutive reference weeks) shall be distributed uniformly in all the weeks of the quarter. The sample for the reference quarter (in each NUTS 2 region) shall be distributed in the 3 months proportionally to the number of weeks in each month		
(b) The sample shall have an infra-annual rotation pattern. There must be a minimum sample overlap of 20% between the same quarters in consecutive years and of 50% between consecutive quarters without taking into account attrition.		
Without prejudice to Article 5(1), data shall be provided for the full sample.	Without prejudice to Article 5(1) 6(1) , data shall be provided for the full sample.	
2. Sample characteristics of the Income and Living Conditions domain shall include:		
(a) The sample shall have a minimum six-year rotation scheme.	(a) The sample shall have a minimum four-year six-year rotation scheme.	<u>16 MSs do not support six-year longitudinal panel extension of SILC.</u> The six-year longitudinal panel extension of SILC would increase the response burden on respondents. As regards the survey, it can potentially affect negatively the response rates

		<p>and quality of results</p> <p>This would require major methodological adjustments and long transition periods. At the same time, it brings in our view only a moderate improvement of one particular indicator and in potential for longitudinal analysis, which generally requires longer time span and long duration – cohort type of longitudinal data collections.</p> <p>Attrition and panel mortality increase always with the number of waves. This results in a lower quality of the cross sectional results which are the basis for political indicators; why is a six-wave panel needed for evaluation?</p> <p>This question had been discussed at Working Group level but MSs didn't receive any feedback about the concerns raised. From sampling and production perspectives, there are still open questions and issues to be discussed before an official opinion can be given</p>
<p>(b) Without taking into account attrition, the sample shall be equally distributed over the years of the rotation scheme, except during the period of changes of the sample size.</p>		<p>Point 2(b) of Annex III needs to be clarified further.</p>

3. Sample characteristics of the time use domain shall include: the reporting periods allocated to the sample units shall		
(a) be distributed over a consecutive twelve-month period,		
(b) include non-working days,		
(c) be based on a random sample.		
4. Sample characteristics of consumption domain shall include: the reporting periods allocated to the sampled units shall be distributed over a consecutive twelve-month period.	4. Sample characteristics of consumption domain shall include: the reporting periods allocated to the sampled units shall be distributed over a consecutive twelve-month period.	Deletion of this paragraph is proposed in line with the suggested amendments to the main Articles of the proposal

Periodicity

COM proposal	MSs' proposals for wording	MSs' comments and justification
1. For the Labour Market domain, the data sets shall consist of information collected quarterly, annually, biennially and every 8 years. Data on variables relating to ad-hoc subjects shall be collected every four years.		
2. For the Income and Living Conditions domain, the data sets shall consist of annual, triennial and sexennial information. Data on variables collected relating to ad-hoc subjects shall be collected every two years.	2. For the Income and Living Conditions domain, the data sets shall consist of annual, triennial and quadrennial sexennial information. Data on variables collected relating to ad-hoc subjects shall be collected every two years.	<u>2 MSs propose the amendment.</u>
3. For the Health domain, the data shall be collected every 6 years.		
4. For the Education and Training domain, the data shall be collected every 6 years		
5. For the Use of Information and Communication Technologies domain, the data shall be collected annually.	5. For the Use of Information and Communication Technologies domain, the data shall be collected every 2 years annually .	<u>1 MSs proposes the amendment.</u>
6. For the Time Use domain, the data shall be collected every 10 years.	6. For the Time Use domain, the data shall be collected every 10 years.	Deletion of this paragraph is proposed in line with the suggested amendments to the main Articles of the proposal.
7. For the Consumption domain, the data shall be collected every 5 years.	7. For the Consumption domain, the data shall be collected every 5 6 years.	<u>2 MSs propose the amendment.</u>

Data transmission deadlines

COM proposal	MSs' proposals for wording	MSs' comments and justification
Member States shall transmit the required data to the Commission (Eurostat) according to the following deadlines at the latest.		
1. For the Labour Market domain, the Member States shall transmit :		
(2) Pre-checked microdata without direct identifiers, according to the following two-step procedure:		
(a) During the first three years of implementation of this regulation, as provided for in article 10(4):		
– For quarterly data: transmission within ten weeks of the end of the reference period,	— For quarterly data: transmission within twelve ten weeks of the end of the reference period,	
– For other data: transmission by 31 March of the next year		Member States should be given time to absorb the impact of the changes before being presented with set deadlines for data transmission. The approach to setting deadlines in Annex V should be consistent: either expressed in weeks from end of reference period or in dates.
(b) From the fourth year of implementation and onwards, the transmission shall be as follows:		

<p>– For quarterly data: transmission of data for quarters 1, 2 and 3 respectively by 29 May, 29 August and 29 November of the</p>	<p>— For quarterly data: transmission of data for quarters 1, 2 and 3 respectively by 29 May, 29 August and 29 November of the same year and of data for quarter 4 by 28 February of the next year within twelve weeks of the end of the reference period,</p>	
<p>– For other data: transmission by 15 March of the next year.</p>	<p>— For other data: transmission by 15 31 March of the next year.</p>	<p>For non-regular ad hoc subjects, the generalised transmission deadline does not leave sufficient time for specific processing/weighting and is likely to cause a non-optimal balance between accuracy and timeliness.</p>
<p>In years when those deadlines fall on a Saturday or Sunday, the effective deadline shall be the following Monday.</p>		
<p>Where administrative data are used to supply data corresponding to the detailed topic ‘income from work’, that data may be transmitted to the Commission (Eurostat) within twenty-one months of the end of the reference period.</p>	<p>Where administrative data are used to supply data corresponding to the detailed topic ‘income from work’, that data may be transmitted to the Commission (Eurostat) within twenty-one months of an agreed timescale after the end of the reference period.</p>	<p>Referring to “period”: This is an inconsistency already existing in the old regulation. There should either be a need for certain data at a specific deadline or not.</p>

<p>(3) Aggregated results for the compilation of monthly unemployment statistics within 25 days after the reference month. Member States may not cover the last week of the reference month when it spills over in to next month.</p>		
<p>2. For Income and Living Conditions domain, the Member States shall transmit pre-checked microdata without direct identifiers, according to the following deadlines:</p>		
<p>(a) concerning the variables for the data collection of year N, by the end of the year N. In exceptional cases, when the required administrative data are not available on time, provisional microdata concerning income may be transmitted by the end of the year N, and the final data by 28 February of the year N+1,</p>	<p>(a) concerning the variables for the data collection of year N, by the end of the year N. In exceptional cases, when the required administrative data are not available on time, provisional microdata concerning income may be transmitted by the end of the year N, and the final data by 28 February May of the year N+1,</p> <p><u>Alternative proposal:</u></p> <p>(a) concerning the variables for the data collection of year N, by the end of the year N. In exceptional cases, when the required administrative data are not available on time, provisional microdata concerning income may be transmitted by the end of the year N 31 of January (N+1), and the final data by 28 February 30 of April of the year N+1,</p>	<p>The final deadline is very close to the current dates of finalization of input registers.</p> <p>For the Income and Living Conditions domain, transmission deadlines are too ambitious, especially for small Member States with relatively few resources. Such a deadline will require an enormous increase in the production</p>

		<p>costs. In addition such deadline leaves little time space for data processing It requires stable and tested design and data production process and may not be achievable in case of major changes. A focus on transmission deadlines must be matched by an equal focus on data quality.</p> <p>Why is this exception possible if administrative data are used? This transmission deadline for provisional data by the end of year N and final data by end of February N+1 could be valid for all Member States, not only if special data sources are used.</p> <p>Additionally, a clarification of the Commission (Eurostat) whether point 2(a) refers to the cross-sectional component and 2(b) to the longitudinal component, is requested.</p>
<p>(b) concerning the variables related to the six years of the rotation scheme ending in year N, by 31 October of the year N+1</p>	<p>(b) concerning the variables related to the four six years of the rotation scheme ending in year N, by 31 October of the year N+1</p>	<p><u>4 MSs propose the amendment.</u></p> <p>Different timetable for longitudinal data is not necessary, the same deadlines as for (a) can apply since the format of transmission is a "reconciled file" (combined cross-sectional and longitudinal information).</p>

3. For the Health domain, the Member States shall transmit the pre-checked microdata within nine months after the end of the national period for collecting the data.		
4. For the Education and training domain, the Member States shall transmit the pre-checked microdata within six months after the end of the national period for collecting the data.		
5. For the Use of Information and Communication Technologies domain, the Member States shall transmit pre-checked microdata by 5 October of the survey year N.		
6. For the Time Use domain, the Member States shall transmit the pre-checked microdata by at the latest fifteen months after the fieldwork is finished.		
7. For the Consumption domain, the Member States shall transmit the pre-checked microdata within fifteen months after the end of the reference year.	7. For the Consumption domain, the Member States shall transmit the pre-checked microdata within twenty fifteen months after the end of the reference year.	Final statistics are not published until mid-march. Therefore a deadline 20 months after the end of the reference year is proposed.