



## FRIBS legislation

**First and foremost it is important for me to stress that we do want improved data quality, but it is imperative that this will not compromise neither data confidentiality nor the trust in this confidentiality.**

As we see it the most important advantage from the proposed FRIBS legislation is related to the sharing of microdata. This can help improve data quality and reduce burdens for data suppliers (firms). And as the questionnaire notes, some legislation on this is much needed.

However, we must emphasize our great concern with regards to the issue of data confidentiality as well as data suppliers' trust in data confidentiality.

It is imperative that firms are convinced that their competitors do not get access to strategic information about their business. It will be a serious breach of law for companies listed on the stock market to deliver (directly or indirectly) any information about sales before issuing a notice to the stock exchange, where they are listed.

We have 450 bodies collecting statistics in the EU. Many of these have their main business in selling market information. It will therefore be extremely difficult to ensure the trust of confidentiality, should these kinds of firms get general access to microdata.

We do see advantages with the FRIBS proposal, but it is imperative to solve the issue of confidentiality first.

Therefore, we have to approve where microdata will be kept, who will have access to the microdata, how users of these data will be surveyed and how they will be punished should the misuse these data.

The way the FRIBS framework is laid out now, we run a high risk of an explosion in corporate espionage within the EU.

We must ensure that companies have absolute trust in confidentiality. Therefore, it will not be enough that the Commission feels secure about the confidentiality. If the reporting companies are not convinced of the confidentiality they will not supply reliable figures (they will instead report falsified figures). So the bottomline is that Danish firms will not supply reliable microdata to be used freely by statistical bodies in other member countries.