



Opinion on the Draft 2025 Work Programme for European statistics

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26 June 2024

Introduction

According to Article 2 of the decision of No 234/2008/EC of the European Parliament and of the Council of 11 March 2008 establishing the European Statistical Advisory Committee (ESAC), the Commission must consult the Committee at an early stage in the preparation of the Community statistical programme.

In a letter ⁽¹⁾ to the Chair of the ESAC, the Director General of Eurostat invited the ESAC to provide its comments on the draft *2025 Work Programme for European Statistics (AWP 2025)*. The deadline for responses has been set at 26 June 2024.

This ESAC opinion is based on:

- The draft AWP 2025 document and its annexes, a detailed presentation by Eurostat of its priorities, and further exchanges with Eurostat about specific questions.
- The ESAC opinion also reflects discussions during meetings organised by the ESAC in the last twelve months on specific topics (energy statistics, health, experimental data, strategy for environmental accounts, Eurobarometer results on user confidence) or events organised in the framework of the European Statistical System (ESS) (workshops, conferences).

This opinion is divided into two parts: a first part with general comments that are relevant to the draft AWP 2025, and a second part addressing issues specific to each of the programme's headings (except heading 9, which concerns internal Eurostat matters).

¹ Ares (2024) 3240121

GENERAL COMMENTS

1. The ESAC welcomes the ambitious *2025 Work Programme for the European statistics* which will be the 5th annual work programme under the Single Market Programme 2021-2027. While many projects achieved by 2024 are now under regular activities, and some other initiated in the previous years will continue in 2025 (such as the improvement of environment accounts and the development of the statistical data on digitalisation), the 2025 programme includes a number of new projects and activities which are very important such as the implementation of the amended Regulation 223/2009, expected to be adopted by end of 2024 which will facilitate access to and use of new data sources, the final update of the System of National Accounts (SNA) and the starting update of the European System of Accounts (ESA) 2010, activities linked to the expected adoption of the framework regulation on all Labour Market Statistics based on Businesses and the preparatory work for the Integrated Farm Statistics Regulation 2030 and beyond. The ESAC underlines that international and European developments (war, inflation, climate change...) continue to pose major challenges to the ESS, which will also require new and rapid responses from it in an ecosystem involving an increasing number of other data providers and the rapid development of artificial intelligence (AI). Furthermore, although the actions envisaged will be initiated by Eurostat, their successful implementation will require the active participation of the Member States and the effective coordination and cooperation between the national statistical authorities and the relevant national and European stakeholders.
2. In a context where data of all kinds abound, quality will increasingly be the distinctive feature of official statistics. The ESAC welcomes the forthcoming amendment of Regulation 223/2009, which opens new opportunities for access to new data sources (administrative, private, organic), but also poses new challenges (also for metadata) in terms of quality and its specific features (comparability of data, linkage issues, timeliness, relevance, etc.). The ESAC recommends that the necessary work with the National Statistical Institutes (NSIs), the Other National Authorities and other administrative data providers be emphasised in the program. The ESAC also underlines that, for example in environmental accounting systems, there is a growing interest in new data sources requiring different quality control processes. Within this context, it might be useful considering processes for the development of quality criteria that include more diverse stakeholder groups who are engaged in data production processes, without compromising fundamental principles of official statistics. New data sources including for example BIG DATA, AI generated data, remote sensing, as well as corporate data or citizen science will also require distinct quality criteria and widely agreed and transparent approaches to drawing on such data pools for official statics, indicators, and accounts. This has also implications for the need for publicly accessible representations of different dimensions of uncertainties associated with such data in the metadata.

3. The ESAC appreciates the efforts that have been made to simplify the messages, adapt data access to different types of users and to increase statistical literacy. This needs to be continued together with enhancing the information about the principles of official statistics (e.g., professional independence, impartiality, confidentiality) and functioning of the whole ESS. The ESAC welcomes the improvements made to the Eurostat website. However, the ESAC would like to suggest that clear actions are also taken to improve the understanding of the data for certain categories of users (potential or occasional users), namely by developing the inclusion of "light metadata" with easy explanations associated to each indicator. However, the ESAC thinks that this might not be enough to ensure trust in official statistics. To this end, increased collaboration with intermediaries with communication impact, who are "listened" to and trusted, namely journalists, opinion makers, social networkers, influencers could/should be considered. In the long term, the ESAC is convinced that, in addition to very strong quality safeguards, gaining the confidence of citizens also requires an efficient communication strategy to market and develop its "brand" and key principles as trustful European official statistics and induce more automatic feedback by people who use them. Finally, the ESAC suggests that Eurostat take action to encourage Member States to include in their educational curricula (all levels of education and from the initial schooling onwards) topics about using official statistics, its importance and its key principles, to ensure that the use of official statistics is a key competence of a modern education and an important element in *lifelong learning* courses. The ESAC values the role of the European Master in Official Statistics (EMOS) network in this area.
4. The ESAC supports the view that innovation is key to meeting current and future challenges, especially to produce multi-source statistics. Therefore, the ESAC welcomes the related activities foreseen in the AWP 2025 and underlines the need to foster sustained interdisciplinary cooperation with academic and research institutions as well as data providers and respondents, in particular when developing new statistics, testing new methods and using various data sources. The ESAC particularly welcomes the reinforcement of activities pertaining to statistics under development (previously referred as "experimental statistics") which should enhance innovation. In this context, the ESAC supports the view that these statistics under development should be clearly disseminated under the umbrella of official statistics with their quality features and own limitations being properly communicated. In addition, cooperation with users, including the researchers as well as with the data providers/respondents, should be strengthened from the outset in order to improve the statistics under development, in particular in defining the desired insights while new surveys will be required. The ESAC also considers that ensuring regular, standard production of these statistics is key. The ESAC will follow up closely on the transition from the experimentation stage to standard stage of these statistics under development and recommend considering the impact on data providers and respondents in terms of upstream data checks and verifications.

5. Given the risk of emerging or potential crises at European and international level, the ESAC considers that a high degree of agility (such as for developing dashboards or experimental statistics) must be always maintained to meet developing data needs for policy making, such as economic sovereignty, security, energy, climate, inflation and corporate earnings, poverty and homelessness, migration and refugees, etc. The ESAC would like to highlight the importance of the increasing growth of AI that is often presented as a revolutionary tool that obviously cannot be ignored in the production of official statistics. However, it has also serious social impacts on our societies, on the organisation of enterprises, on the workforce and the work processes, on education and training and implications for governance. Appropriate and objective measurements of these impacts are required in order to support effective policy- making. The ESAC recommends emphasizing these urgent needs in the work programme.

6. The ESAC advocates that innovative actions and the development of new statistics should be supported by dedicated and adequate resources for the whole ESS. In this respect, it is of the utmost importance that NSIs and administrative data providers are provided with sufficient financial and staff resources to achieve the AWP 2025 objectives, in particular to cope with increased use in administrative data. Moreover, innovative actions should not be undertaken at the expense of further reduction of existing statistics.

7. The ESAC underlines the need to strengthen cooperation with the different categories of researchers and their early involvement in a context where innovation will increasingly be key to the use of new data sources, new methodologies and the development of new statistics. This is in line with the forthcoming revised Regulation 223. The ESAC also considers that cooperation with researchers is key to increasing trust in official statistics and therefore an overall strategy for cooperation with researchers should be developed in all the domains. Therefore, the ESAC would like to reiterate that the draft AWP 2025 as it stands does not seem to provide for Eurostat grants² to be specifically opened to researchers, if necessary, in cooperation with or as subcontractors of the national statistical offices. There does not clearly appear to be a role for universities in the projects concerned. The ESAC believes that there is a potentially large workforce in universities that could be interested in official statistics not only in methodological issue but also in some specific domains or in the area of experimental statistics. While the ESAC understands that there may be some legal issues to consider, it recommends finding ways to clearly signal possible

² For example, Par 2.7 of the 2025 work programme about the type of applicants targeted by the award of grants reads: “Under Article 195(d) of Regulation (EU, Euratom) 2018/1046 and Article 10(1)(h) of Regulation (EU) 2021/690: bodies that are identified in the list referred to in Article 5 of Regulation (EC) No 223/2009 as national statistical institutes or other national authorities responsible for the development, production and dissemination of European statistics, after evaluation of the projects submitted”

cooperation. The awarding of grants should be an opportunity for a message of encouragement to the NSIs to interest universities for the challenges they face. The ESAC also supports the view that, in order to improve cooperation with researchers, Eurostat could organise a research conference for example every two years on a particularly salient topic, so that researchers, NSIs and Eurostat could jointly frame the issues and then inform on what kind of research consortia could be formed, so that there is more cooperation and less fragmentation in the way these issues are addressed. In this respect, the ESAC also considers that improving access to the highly detailed micro-data which are necessary for research remains a pre-requisite for more collaboration. It is still in many cases uneven at both national³ and European levels⁴. The benefits of secure remote access to highly detailed data within the EU, access by researchers to administrative data and the possibilities of data linkage should be exploited as much as possible, while complying with data protection rules. This requires moving forwards and in case corresponding adjustments in the national statistical jurisdictions.

8. Eurostat should enhance its cooperation with users, focusing not only on communication but also on engagement aspects. It should be more proactive in involving users and in taking user needs (according to their various categories consider various status – policy makers/other institutional/researchers/general public/etc– and their statistical proficiency (Heavy users, light users, users with a general interest) into account at an early stage in the design of work programmes (both annual and multi-annual) as well as in the design of new surveys. In this context, the ESAC advocates that the AWP 2025 should strengthen and promote the relationship between Eurostat and the ESAC and provide the ESAC with the necessary support and resources to develop its relationship with National User Councils (NUCs), taking into account the heterogeneity of the organisation of the statistical systems in Member States. The ESAC would also encourage Eurostat to undertake more regular actions, such as organising thematic webinars or seminars with European business associations on some specific topics (e.g., Business or trade statistics), that might enhance the cooperation with these categories of respondents and data providers. Eurostat should also foster cooperation with respondents in testing questions when implementing new surveys.

³ At national levels, access remains in many cases mostly on-site (see the Peer Reviews)

⁴ In the case of the European microdata provided by Eurostat, access to the ScUF (Secure Use Files) via the secure remote access KIOSK remains limited to only two surveys, which seems to be due to a lack of resources for the output checking.

Comments on the Headings

2025 Work programme general priorities

In addition to its general comments, the ESAC hereby provides more specific comments and recommendations regarding some of the activities listed under the different headings of the draft AWP 2025 which are defined by the Single Market Programme.

The ESAC first want to make initial remarks and recommendations that apply to several activities under different headings.

- A 1st set of remarks apply to businesses. Considering the important new policies or policies (Green Deal, sustainability, energy) and the challenges to be faced in the current context (war, scarcity of resources and de-industrialisation), the reporting requirements and possible burden on respondents and data providers, regularly increase, in particular for businesses. The ESAC therefore recommends that a balance be struck between existing and new data requirements. Sharing and integration of existing data available elsewhere, including any administrative data from other institutions, should be prioritised before new data collections are introduced. In the industrial sector, it would always be advisable to check the feasibility of new surveys in advance. In addition, leaps in the quality of existing industrial statistics could also be achieved if the national statistical offices were to provide Eurostat with all the NACE 2- to 4-digit data available to them (Cancellation of the classification for small, medium and large countries in the delivery catalogue). These remarks particularly apply to Heading 2- Internal market, innovation and digital transformation and Heading 4 - Sustainable development, natural resources and environment.
- In view of past and present crises (corona, supply bottlenecks, impending "deindustrialization"), it is also essential to have better knowledge of the company structure and how it is changing. The number of company size classes should be expanded to include the two size classes "500-999 employees" and "1000 and more employees". This involves the business register and the SBS statistics, and the data does not have to be collected additionally - an extension of the calculation programmes is sufficient. An extension of the size categories is also extremely important not only for structural changes. Legislators should also be aware of the number of companies affected when calculating the impact assessment of reporting and administrative burdens. These remarks particularly apply to Heading 1 - Economic and Monetary Union, globalisation and trade and Heading 2- Internal market, innovation and digital transformation.

- A second series of remarks apply to regional and local statistics under different headings. The ESAC wishes to reiterate the importance of sub-national data to support the design, monitoring and evaluation of EU policies and to apply the principle of "*Do no harm to Cohesion*". We encourage Eurostat to continue discussions with DG REGIO, other DGs of the European Commission and the Committee of the Regions to explore the need for and feasibility of additional regional statistics for use in the design and implementation of all EU policies, not only with a view to the future Cohesion Policy. In particular, regional statistics would be very useful in the area of green, digital and demographic transitions, to measure the differentiated impacts of these transitions on people and places. We also call Eurostat to leverage the outcomes from the REGIONS 2030 pilot project and further explore possibilities for providing data to localise the implementation of the Sustainable Development Goals (SDGs).

Heading 1 - Economic and Monetary Union, globalisation and trade

National accounts represent a source of crucial macroeconomics indicators inspiring policy-making. Their quality should be at the highest possible level as they inform policies and some regulatory procedures, notably the Excessive Deficit Procedure. The ESAC is of the opinion that the revision of the methodological framework reflecting new societal developments and needs for statistics is of utmost importance. The European implementation of the updated global System of National Accounts is a unique opportunity to achieve full consistency of methodological guidelines in Europe with the international statistical standards. Therefore, the ESAC recommends that the update of the EU national accounts standards and testing should be thoroughly and strongly supported, and that European and national implementation strategies should be developed in the ESS, also further building on the close cooperation with the European System of Central Banks in the production of statistics.

In the opinion of the ESAC, due to a growing importance of services in the economic output of national economies and the whole EU, a better coverage of this sector by national accounts is necessary. Thus, more efforts in this area would be highly recommended.

In view of the complex transition to the 2025 SNA, the ESAC recommends continuous and extensive communication actions to inform users (experts and non-experts) about the upcoming changes and the results of the feasibility and impact assessment carried out by Eurostat. The impact on both data providers and EU macroeconomic governance systems should be included in the communication planning.

The ESAC would like to emphasise that, in view of the current high inflation rates and the challenges faced by policy makers and monetary authorities in reducing them in Europe, further input harmonization for the HICP is recommended, also in relation to housing prices.

The ESAC also welcomes the development of new and experimental statistics around globalisation, which will provide a clearer picture of value creation and distribution and will be very useful for economic analysis and policy-making. The ESAC underlines the importance of these statistics in the context of ongoing discussions on economic sovereignty and security.

For this type of statistics, sectoral information is of particular interest to some categories of users, such as industry. However, it remains to be seen whether these new and experimental statistics, which are subject to time lags, will be produced with an acceptable cost-benefit ratio and burden on businesses. We also welcome the approach of making the questionnaires flexible enough by including highly topical questions and hope that the suggestions from Member States will be considered in a balanced way (as with the new GVC survey).

The ESAC looks forward to the first results on micro-data exchange and customs data exchange for international trade in goods statistics. The ESAC welcomes the use of micro-data exchange and improved estimation procedures in intra-Community trade statistics and looks forward to qualitatively sound results. The ESAC underlines the importance of a smooth process from a technical point of view and that national publications are not delayed.

Heading 2- Internal market, innovation and digital transformation

Under this heading, a broad range of statistics whose amount is rapidly growing, as they cover booming cross cutting areas such as digital transformation and its impacts on society, is addressed. Business statistics including both, structural and short-term statistics are at the core. New challenges contain not only a coverage of new fields but also an adjustment of classifications, such as NACE and CPA, but also a broader coverage of size classes of firms (e.g., micro firms, "500-999" and "1000 and more"), multisource data, and methodologies which need to be integrated in the production system.

In the context of NACE and CPA revisions, the PRODCOM list must be also adjusted, and it is of crucial importance that relevant stakeholders are involved and appropriate time for consultations is provided. This process should be well coordinated.

It stands to reason that the response burden is an important issue in this area and all possible efforts should be made to keep it bearable for respondents.

The ESAC also recommends improving the communication of new statistics on digitalisation and in particular on the platform economy. Currently, a heading "collaborative economy" is used, which only includes short-term accommodation rentals through digital platforms.

The ESAC also believes that Research and Innovation (R&I) indicators at the regional level are generally good, but somewhat uneven. They cover both firms and individuals, but often cannot be used - together - as a proxy for the robustness of the local innovation ecosystem. As a result, some indicators curated by the JRC for the European Commission, such as the Regional Innovation Index or the Industrial Innovation Index, have limitations in capturing national and sub-national realities in terms of R&I policy progress.

Concerning digital transformation, the ESAC believes that special focus should be given to actions to measure digital maturity and the active use of digital technologies, including AI, at local and regional level (in addition to the Digital Economy and Society Index to actively measure digital transformation at sub-national level).

The ESAC would also like to underline that in the area of tourism, local and regional authorities need new indicators to assess visitor profiles and behaviour in order to assess the local impact in relation to the three pillars of sustainability (environmental, social, economic). The ESAC therefore welcomes the priority activity [TOUR] "Implementation of improved geographical granularity of accommodation statistics, further development of tourism satellite accounts and development of tourism sustainability indicators".

Heading 3 - Social dimension of Europe

The ESAC welcomes the various activities and statistics under this important heading and supports the continuation of efforts for the redevelopment of European population statistics and finalising negotiations on the Commission proposal for Regulation on European statistics of population and housing.

The ESAC considers that the program under this heading could be improved in some areas and note that in the topics for 2025 lack the reference to migration (it was considered in AWP 2024).

The ESAC underlines that population longevity is one of the most important challenges facing societies today. Mortality affects people differently, not only according to sex or age, but also according to other social dimensions (such as level of education, activity or economic status, degree of urbanisation, etc.). The ESAC therefore would welcome new indicators on this topic - namely by combining "Life expectancy by age and sex" with other social relevant dimensions or by introducing new factual (and not only perceived) indicators about "Healthy Life Expectancy" - and the updating of existing indicators, such as "Life expectancy by age, sex and educational attainment level". To this purpose, the use of administrative data rather than census could prove beneficial.

The ESAC would also like to draw Eurostat's attention to the fact that section 2.7 of the work programme on grants, no longer covers the improvement and development of demography, migration and population and housing census statistics. The ESAC recommends Eurostat to reconsider reviewing this part of the programme.

With respect to the planned data collection on new forms of work, the ESAC is of the view that these data would benefit from better structuring under a common heading of digital transformation / platform economy / labour markets. In addition, users would benefit from a clearer overview of the data on new forms of work in the platform economy collected as part of the LFS in selected Member States. The ESAC recommends that these data should be integrated with the main LFS data via the Eurostat website. This will improve users' understanding of the scope of available data on digitalisation in the labour market domain.

The ESAC also considers that some areas exist where more information at regional level would be desirable, for example for social economy (number of social economy organisations and enterprises and their impact on local economy), gender and domestic violence (gender-based violence and domestic violence), poverty, social exclusion and housing deprivation (e.g.,

disability employment gap or persons at risk of poverty or social exclusion by level of disability).

Finally, the ESAC would like to encourage the on-going discussions on the priorities for statistics in the health domain and the role of the official statistics within the data ecosystem in this important domain.

Heading 4 - Sustainable development, natural resources and environment

The activities under heading 4 are at the heart of the challenges facing official statistics to provide many new statistics in the context of rapid climate change. The ESAC particularly appreciates the efforts in the field of energy statistics.

On sustainable development, the ESAC believes it is important to continue to provide data to localise the implementation of SDGs as a follow-up to the REGIONS2030 project, which was a joint effort between the European Parliament, the European Commission and 10 pilot regions to co-design and develop a set of indicators to monitor the SDGs at the regional level in Europe. In this respect, the ESAC appreciates the efforts of Eurostat to cover such challenging areas as management of natural resources, reduction of food waste or development of assistance commitments, as for or these targets it is difficult to associate available indicators at the regional level.

The activities "Circular Economy Indicators" [EnvCircEco], "Climate Change Statistics and Indicators" [EnvClimChange] and "Supporting the Energy Union and the European Green Deal" [751] appear to be very interesting and ambitious. In line with its general recommendation regarding new statistics, the ESAC recommends as much as possible checking in advance its feasibility and avoiding duplication of data collection.

Heading 5 – Economic, social and territorial cohesion

In addition to its initial recommendation regarding the importance of sub-national data in activities dependent on various headings to support the design, monitoring and evaluation of EU policies, the ESAC invites Eurostat to consider how to emphasize these issues under Heading 5 activities which specifically focuses on economic, social, and territorial cohesion. Working with DGs to identify data gaps at sub-national level would allow for better impact assessment in the policy design as well as policy monitoring and evaluation.

The ESAC would welcome efforts to better capture regions in a development trap, as indicated in the report of the High-Level Group of Experts on the future of Cohesion Policy and in the 9th Cohesion Report. In particular, it would be useful to extend the coverage of regional statistics on income distribution by using additional data sources to measure inequalities more accurately and at more detailed spatial levels.

The ESAC welcomes Eurostat's planning as recently outlined in Commission Staff Working Document SWD (2024)450 taking stock of the implementation of the EU rural action plan (2021-2023) and accompanying the report on the implementation of the long-term vision for rural areas.

Concerning functional areas, the ESAC appreciates the inclusion of the priority activity [Urb] "Provision of statistical indicators on cities and Functional Urban Areas" and would encourage the future developments of indicators on other types of Functional Areas.

On housing, beyond the existing indicators by degree of urbanisation, the ESAC welcomes the future collection of data on population and housing at NUTS 3 level.

Heading 6 – Better communication of European statistics and its values by promoting it as a trustworthy source in tackling disinformation

As indicated in the general comments, the ESAC considers activities under Heading 6 as crucial to increase public trust in official statistics. In addition to its general comment, the ESAC underlines the necessity to continue efforts about the user-friendliness interface where some difficulties remain and to make necessary corrections when such problems are reported. The ESAC considers that more needs to be done to improve the understanding of data by potential or occasional users. In this context, the ESAC notes that the draft AWP 2025 as it stands lacks clarity in the description⁵ of the statistical literacy activity (Annex 1 of the AWP 2025 - List of activities and outputs. In particular, the ESAC considers metadata as a potential tool to promote statistical literacy and would welcome very much the presentation of "light metadata" with simpler explanations. To strengthening trust in statistics and their appropriate analysis, ESAC also welcomes the follow up of results of Eurobarometer survey⁶. The ESAC believes that statistical literacy is essential for public trust in official statistics and recommends the development of a new indicator to measure statistical literacy across the EU.

Heading 7 - Reaping the benefits of data revolution and moving to trusted smart statistics

The ESAC strongly welcomes the actions foreseen under the activity "[794] Trusted Smart Statistics" as they involve the use of existing data. However, the ESAC recommends that the adaptations to the national statistical legal bases should always be considered.

The ESAC also noted that one output following the establishment of a web intelligence hub is the development and implementation of an infrastructure to collect, process and produce statistical data from web sources. The ESAC recommends that the outcomes of these types of

⁵ Description: "Expand the range of statistical literacy products and increase their uptake. Share good practices with NSIs in the framework of LitNet."

⁶ One of the activities foreseen in the annexe 1 of the AWP 2025 is "Measuring the public's trust in official statistics - Follow up of results of Eurobarometer survey".

web-based data collection be evaluated by comparing them with traditional collections, and the results being communicated to users.

The ESAC also considers, that with a consistent data management strategy, AI – including Machine Learning and Large Language Models – may facilitate, inter alia, data sharing and access to non-technical users. An overarching and consistent data management strategy can support and enhance these endeavours.

Heading 8 – Expanded partnerships and statistical cooperation

The ESAC welcomes the activities foreseen under this heading and stresses the importance of statistical cooperation at international level.

Concerning the activities of the ESAC secretariat (also working for the ESGAB), and in addition to the ESAC's general comment on the relations with the users, the ESAC notes that there is no mention on the relations between the ESAC and the NUCs for which a workshop which is key to foster these relations (as envisaged in Decision No 234/2008/EC establishing the ESAC) and which is foreseen in 2025. Similarly, in addition to its general comment on the importance of the cooperation with the researchers, the ESAC notes that the only mention of cooperation with research is under the EMOS which is a specific program focusing on post-graduate education. Cooperation with the research involves other activities which do not figure as such anywhere in the draft AWP 2025 and its annexes. The ESAC would welcome Eurostat considering include/mentioning such cooperation in the list of activities foreseen in the draft AWP 2025.

Concerning the activity to assess and monitor the statistical systems in the Enlargement, European Neighbourhood Policy and Central Asian countries, the ESAC suggests that the use of new data sources, including administrative data, should be an important topic - among others - for assistance to these countries.

Heading 9 – Modernising the administration

The activities under Heading 9 are internal to Eurostat, mostly about IT development and administrative work. Therefore, the ESAC abstained from making recommendations.