

Paper from NL and DK for European statistics on population and housing

This paper presents NL and DK's position on the proposal for a regulation of the European Parliament and of the Council for European statistics on population and housing, amending Regulation (EC) No 862/2007 and repealing Regulations (EC) No 763/2008 and (EU) No 1260/2013. [\[Interinstitutional file: 2023/0008\(COD\)\]](#)

There are three main concerns for NL and DK in the upcoming negotiations:

- the population definition requires an adjustment that allows the use of register data;
- 'safeguards' are needed to prevent the inclusion of numerous new detailed topics and variables not available in registers;
- 'ad-hoc' surveys will normally focus on topics not covered by registers. Topics that should be studied in targeted and specialised surveys focusing on a subset of the population rather than the total population.

NL and DK recognise the Union's need for high-quality and comparable European statistics on population and housing in order to monitor and evaluate Union policies, in particular those that address economic, social and territorial cohesion as well as demographic change. In this respect, NL and DK support the objectives of the proposed new Regulation.

However, NL and DK believe that it is important to ensure that the production of population and housing statistics will not have a disproportionate impact on the Member States and their national statistical institutes. In addition, we consider it important that the proposed Regulation does not create barriers to or impede the use of methods and sources that have proven to be cost-effective and of sufficient quality for decades.

In addition, in order to achieve the objectives of the Regulation, we believe it to be desirable that all 27 Member States are able to implement the Regulation effectively in their specific national contexts without the need for large-scale or costly changes to national collection and production systems.

In both NL and DK, organisations with a public task, such as the national statistical institute, are legally obliged to use the national basic register of persons in combination with other key registers. This means that these organisations no longer need to request data from the citizens and enterprises directly if this information is already available in a basic register, to avoid creating unnecessary additional burdens. Therefore, an essential condition for NL and DK is that that we are able to continue the current national practice and use the national population register in combination with other government registers at our disposal in order to comply with the Regulation. In this context, it should be stressed that this is the only way for us to meet the objectives of the Regulation, and we have argued for the inclusion of clear and precise provisions in the enacting terms of the Regulation that would allow us to continue to produce population statistics from administrative registers, i.e. the "registered population" can be used provided that the quality criteria defined in Article 12(1) of Regulation (EC) 223/2009 are met.

The harmonisation of the population base concept as proposed by the Commission may have a disproportionately adverse impact on the structure of fundamental data collection in NL, DK and in other Member States that base their data collection for population statistics mainly on administrative data sources.

Summarising, it is crucial that we are able to continue the current national practice and use all existing administrative sources at our disposal in order to fulfil the legal obligations within the scope of the proposed Regulation under the precondition of ensuring high-quality statistics. Furthermore, it must be emphasised that if the data used to produce statistics cannot be obtained from existing administrative sources, and must be collected through surveys, the implementation of the proposal will lead to a disproportionate increase in cost for the national budget and increase the response burden on our citizens. This seems undesirable, both financially and politically.

Furthermore, the proposed Regulation is part of the Regulatory Fitness and Performance Programme (REFIT), and is therefore meant to contribute to the simplification and reduction of the regulatory burden. The current proposal reduces the number of statistical Regulations, but in our view falls short of reducing the reporting obligations for the Member States. In this proposal we see the actions of the Commission as having the opposite effect: the frequency would be increased from yearly to quarterly, every six months and several times per year.

Moreover, the present proposal would give the Commission very broad powers to adopt delegated and implementing acts, making it difficult for the co-legislators to assess the actual content and scope of the Regulation. The power conferred would be the power to determine the entire scope and content of statistical information obligations for the Member States.

In other words: "which" information the Member States would be obliged to provide is currently undefined and consequently unclear. This would lead to a high level of uncertainty for the Member States. NL and DK deem it important that the proposed powers of the Commission be properly delineated, by means of safeguard provisions. Such provisions should be included in order to avoid higher production costs for Member States and an increase in the response burden for citizens.

With regard to Article 5 (statistics requirements) and in conjunction with the Annex, NL and DK would like to maintain their position that clear and effective safeguard provisions with regard to delegated acts and implementing acts should be included in the enacting terms of the Regulation, for both the initial implementation phase and for future new requirements and alterations. With regard to the ad hoc statistical requirements provided for in Article 7, NL and DK would like to maintain their position that this article should be removed in its entirety, because NL and DK believe that the Commission already has sufficient legal instruments at its disposal to regulate ad hoc statistical requirements.

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