Non-paper from the Netherlands, Czechia, Denmark, Estonia, Latvia, Lithuania and Slovakia – response to the Council's conclusions on EU statistics, stress-testing and the simplification of statistical legislation.

1. Introduction

This non-paper calls for a clear top-down approach to simplification, aimed at delivering tangible and measurable reductions in the administrative burden. It makes the case for the prioritisation of concrete reductions in the existing legal requirements and targeted contributions to forthcoming Commission proposals. The signatory Member States expect concrete and top-down simplification proposals coordinated by Eurostat, ahead of the high-level meeting under the Irish Presidency. These proposals can form the basis for further deliberations in the European Statistical System Committee (ESSC) in October 2026 and subsequent work towards an omnibus package of implementing acts in early 2027.

The signatories submit this non-paper as part of the Commission's simplification agenda[1] and in response to the conclusions of the November 2025 Council on EU statistics[2]. This non-paper highlights the annual progress report on simplification, implementation and enforcement presented by the Commissioner for the Economy, Productivity, Implementation and Simplification in October 2025[3].

The above report underscores the Commission's intention to review the European statistics acquis with the aim of (i) reducing and eliminating the administrative burden on businesses, in particular on small and medium-sized enterprises (SMEs); (ii) simplifying statistical requirements and modernising and streamlining data collection processes, notably through increased digitalisation; and (iii) reducing compliance costs for national statistical institutes within the European Statistical System (ESS), while maintaining quality and comparability.

The signatories strongly support the Commission's ambitious simplification agenda in this area, and view these three objectives as policy priorities that will, where possible, reduce the reporting burden on enterprises and on SMEs in particular. This is vital in order to enhance competitiveness, in our view. The objectives will also help ensure that the statistical acquis remains relevant and encourage the phasing out of data collection that is no longer relevant to current policy-making or monitoring purposes.

The signatories conclude that:

1. The Commission should, as a matter of urgency, come up with a comprehensive simplification package containing concrete proposals for reducing the administrative burden and compliance costs in European statistics, with a particular focus on enterprises and SMEs, wherever possible.
2. The Commission should undertake an in-depth regulatory review[4] of the European statistical acquis without delay, covering framework regulations, sectoral legislation, delegated and implementing acts, and related voluntary data collections, with priority given to high-burden domains such as European business statistics.
3. The Commission should, based on the in-depth regulatory review and the priority areas identified in this non-paper, put forward a dedicated simplification package for the whole of the EU's existing legislation on statistics, including targeted amendments to existing requirements and an omnibus package of implementing acts by the end of the first quarter of 2027.

[1] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions A simpler and faster Europe: Communication on implementation and simplification.
[2] 2025 Council conclusions on EU Statistics
[3] 2025 Annual Progress Report on Simplification, Implementation and Enforcement of Commissioner Valdis Dombrovskis
[4] European Council conclusions 19 March 2026: Simplification and reducing administrative burdens

2. Call for action: a comprehensive simplification package in the European statistical acquis

Simplification and better regulation have been under discussion within the ESS for over a decade. The task now is to make progress on achieving these goals. We therefore call for the prioritisation of stress testing, followed by a comprehensive simplification package for the whole of the EU's existing legislation on statistics, without delay. This package should cover the framework regulations, sectoral legislation, delegated and implementing acts, and the related voluntary forms of data collection. It should lead to concrete proposals for reducing the administrative burden and removing outdated statistical requirements. The first tangible proposals for simplification should be available by the end of the first quarter of 2027, at the latest, in order to maintain political momentum and demonstrate progress.

The focus should be on the statistical domains with the most potential for reducing the burden on business and the greatest potential benefits for businesses. Reviewing the regulation on European business statistics should be a priority, since the majority of the administrative burden and compliance costs on enterprises comes from this regulation, including the delegated and implementing acts. At the same time, other domains where there is a significant burden on enterprises, governed by the Regulation[5] on European Union labour market statistics on businesses, should also be prioritised, since these also account for a great deal of the response burden on businesses. These measures should be prioritised immediately in order to deliver tangible benefits for the business community across the Union, especially SMEs.

3. Applying the 'collect-once-only' principle

The 'collect-once-only' principle should be applied in all statistical domains. This means that, where possible, priority should be given to the reuse of data from existing administrative sources held by national public authorities and quasi-public bodies, thereby minimising the requirement to collect new data from businesses and citizens.

Innovative methods, modelling and estimation techniques and new data sources, including data held by the private sector, may be used in cases where data cannot be obtained by other means or where this would significantly reduce the administrative burden on businesses, provided that such use is proportionate in terms of scope and detail, is consistent with the principle of cost-effectiveness and imposes no disproportionate administrative burden on businesses, while fully respecting data protection rules and requirements regarding commercial and statistical confidentiality. Direct surveys may be used where a demonstrated need cannot be met through less burdensome and sufficiently reliable alternatives.

4. Designing simpler and output-oriented EU statistical legislation

The signatories call on the Commission to ensure that any new initiatives in the field of European statistics are simpler by design and help to reduce the administrative burden on businesses and citizens. Furthermore, every year the Commission adopts a large number of delegated and implementing acts, and the requirements laid down in these acts are often numerous and involve a high level of detail.

To deliver quick wins that will alleviate the burden and related costs without delay, priority should be given to limiting and simplifying these delegated and implementing acts.

[5] Regulation (EU) 2025/941 of the European Parliament and of the Council of 7 May 2025 on European Union labour market statistics on businesses, repealing Council Regulation (EC) No 530/1999 and Regulations (EC) No 450/2003 and (EC) No 453/2008 of the European Parliament and of the Council

This should lead to results in the short term and include a review not only of the basic legislation but also of recourse to delegated and implementing acts.

EU statistical legislation should be designed in such a way that the focus is on outputs, based on harmonised quality standards. Input-oriented requirements – such as fixed processing thresholds, detailed coverage rates and methodological rules or rigid sampling frames – risk limiting the use of existing data sources and methods, and may lead to an unnecessary increase in the administrative burden. We therefore consider such requirements to be undesirable and call for them to be avoided. The EU statistical framework should be better able to accommodate the various approaches taken to data collection by the various national statistical institutes, in order to support burden reduction, efficiency gains, and high-quality output.

5. Ensuring simplification beyond statistical legislation

The focus should be also on ensuring that the "collect once-only" principle is applied systematically to legislative proposals that require the collection of data or information from Member States and its submission to the Commission outside the scope of Union statistical legislation. The application of good regulatory governance and evidence-based policymaking would help to prevent the duplication and contribute to reducing the administrative burden for businesses and citizens and lowering costs for national statistical institutes.

Furthermore, reporting, documentation and financial justification requirements related to Commission grants under the Single Market (and Customs) Programme should be simplified and reduced in general. Where possible, the use of lump-sum financing should be prioritised, as this would further help reduce the administrative burden on NSIs.

6. Looking forward

We urge the Commission to prioritise the actions mentioned in this non-paper and to focus on a results-oriented simplification of the European statistical acquis. Short and medium-term measures should lead to a tangible reduction in the administrative burden for businesses, particularly SMEs. New initiatives should, by default, avoid any increase in the administrative burden and compliance costs and should include thorough cost-benefit analysis.

Annex I – Illustrative examples for potential areas of simplification

The following initiatives (ongoing and planned) could serve as test cases with which to develop a method for stress-testing and identify high-impact opportunities for simplification. New statistical legislation should be guided by the de facto principles of 'one in, one out' and 'collect once-only', and should ensure the full use of existing flexibility in the implementing acts in order to achieve burden reduction across all domains, including in the short-term, and to reduce and streamline metadata and quality reporting requirements.

Existing and new administrative data sources

Prioritise access to existing and new administrative data sources to determine their usefulness for statistical purposes, such as VAT in the Digital Age (VIDA), e-invoicing[6], the EU Customs Data Hub[7], the European Single Access Point[8] (ESAP), online platforms for short-term accommodation rental – data collection and sharing[9], and the proposed European Business Wallets (EBWs) intended to enable secure and harmonised data storage, management and sharing for EU companies across B2B and B2G spheres[10]. These actions should focus on identifying, securing access to, and operationalising data held by public authorities or, if there is no suitable alternative, privately held data. Granting national statistical institutes access to these data sources will prevent the duplication of data collection activities by different public authorities, businesses and citizens.

European business statistics

Prioritise simplification in Regulation (EU) 2019/2152[11] on European business statistics, including its delegated and implementing acts, in order to achieve the greatest impact and visible burden reduction for enterprises across the Union, especially SMEs. European business statistics play a crucial role, as most Union-level reporting obligations for enterprises fall within this area. At the same time, we should ensure a similar level of attention to other high-burden domains for businesses, notably labour market statistics.

Intra-EU goods trade statistics

Promote the broader adoption of the single-flow approach for intra-EU goods trade statistics, which uses partner-country export data to estimate imports, thereby eliminating the need for separate data collection for imports.

Tourism statistics

In the planned review of Regulation (EU) 692/2011 on European tourism statistics, the focus should be on reducing the costs and administrative burden for businesses in the tourism sector by using new data sources, including data already available from the main collaborative tourism platforms. Reduce data requirements and limit new variables, including on sustainability, to those required under non-statistical legislation.

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[6] Council Directive (EU) 2025/516 of 11 March 2025 amending Directive 2006/112/EC as regards VAT rules for the digital age.

[7] Proposal for a Regulation of the European Parliament and of the Council establishing the Union Customs Code and the European Union Customs Authority, and repealing Regulation (EU) No 952/2013)

[8] Regulation (EU) 2023/2859 of the European Parliament and of the Council of 13 December 2023 establishing a European single access point providing centralised access to publicly available information of relevance to financial services, capital markets and sustainability.

[9] Regulation (EU) 2024/1028 of the European Parliament and of the Council of 11 April 2024 on data collection and sharing relating to short-term accommodation rental services and amending Regulation (EU) 2018/1724

[10] Proposal (COM/2025/838 final) for a Regulation of the European Parliament and of the Council on the establishment of European Business Wallets.

[11] Regulation (EU) 2019/2152 of the European Parliament and of the Council of 27 November 2019 on European business statistics, repealing 10 legal acts in the field of business statistics.

Integrated farm statistics
In the planned amendment of the Integrated Farm Statistics Regulation 2030-2039, focus on reducing the administrative burden by (i) promoting modern, notably digital, data-collection tools, (ii) increasing flexibility in data-collection processes, and (iii) widening the use of suitable national data sources, as set out in the Commission's call for evidence[12] on this initiative. Reduce the number of variables in labour modules.

Agricultural Statistics
Reduce the scope of Regulation (EC) No 138/2004[13] on the economic accounts for agriculture (EAA) by reviewing and, where appropriate, limiting its coverage. This could include, for example, reducing the burden on national statistical institutes (NSIs) in relation to quality reporting, removing the requirement for the first or second EAA estimate, and introducing exemptions for NUTS 2 data requirements for small countries. Furthermore, responsibility for the coefficients used for the gross nutrient balance should be assigned to bodies outside the ESS, since such coefficients do not constitute statistical data but are model-based estimates based on specialist expertise.

Social statistics
Under Regulation (EU) 2019/1700[14] on statistics relating to persons and households, prioritise burden reduction and increased flexibility by enabling the broader use of existing and new administrative data sources, including with respect to imputation, in labour force statistics and statistics on income and living conditions. In this context, the scope of statistics on incomes and living conditions should be reduced, and ad hoc and multiannual modules should be streamlined and made less frequent. The level of detail required in implementing acts, including for Regulation (EU) 2025/2458[15] on statistics on population and housing, should be limited.

For the Household Budget Survey, the current approach – in particular the highly detailed diary requirements – needs to be reassessed in light of declining response rates and rising costs as well as the availability of alternative data sources. The continued need to collect detailed diary data should be evaluated, including whether the existing requirements under Regulation (EU) 2019/1700 remain proportionate and whether less burdensome approaches can deliver the required outputs, while ensuring sufficient quality.

National Accounts
In national accounts, focus on identifying targeted reductions in current detail requirements where this does not affect key aggregates, while preserving the existing level of detail in activity breakdowns and time series to safeguard future analytical needs. In parallel, the upcoming revision of ESA 2030 should be used as an opportunity to further simplify requirements and reduce unnecessary complexity.

Transport and energy statistics
Make systematic use of expert-group 'reality checks' when stress-testing legislation in these domains, particularly delegated and implementing acts, in order to propose simplification measures and streamlined implementation options.

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[12] Commission's call for evidence EU integrated farm statistics (2030-2039).
[13] Regulation (EC) No 138/2004 of the European Parliament and of the Council of 5 December 2003 on the economic accounts for agriculture in the Community.
[14] Regulation (EU) 2019/1700 of the European Parliament and of the Council of 10 October 2019 establishing a common framework for European statistics relating to persons and households, based on data at individual level collected from samples, amending Regulations (EC) No 808/2004, (EC) No 452/2008 and (EC) No 1338/2008 of the European Parliament and of the Council, and repealing Regulation (EC) No 1177/2003 of the European Parliament and of the Council and Council Regulation (EC) No 577/98.
[15] Regulation (EU) 2025/2458 of the European Parliament and of the Council of 26 November 2025 on European statistics on population and housing, amending Regulation (EC) No 862/2007 and repealing Regulations (EC) No 763/2008 and (EU) No 1260/2013.