Feedback to the European Commission on the Draft European Statistics on Population and Housing Regulation

The Center for Data Innovation (Transparency Register #: 367682319221-26) is pleased to submit this feedback on the European Commission's consultation and call for evidence regarding the regulation 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.[1]

OVERVIEW OF THE CENTER'S POSITION

The Center would like to commend the European Commission for working to improve the collection and sharing of statistical data in the European Union (EU). Better data supports better decisions and outcomes.[2] The proposed European statistics regulation aims to create more relevant, consistent, and comparable data collection for population and housing statistics across the EU. Differences in existing data collection across EU member states make it more difficult to analyze data. Population statistics are critical to understanding and addressing demographic change, socioeconomic cohesion, achieving United Nations' Sustainable Development Goals, resource allocation, and the demand for goods and services. The proposed regulation creates an EU-level framework to update and harmonize data collection and analysis of demographic, housing, and family statistics.

The European Commission should use this proposed regulation to also address the data divide—the social and economic inequalities that can arise from a lack of data collection and use of data about some individuals and communities.[3] Specifically, the Commission should clarify in the regulation the definition of "hard to reach" groups.

POSITIVE ELEMENTS OF DRAFT REGULATION

The draft regulation succeeds at standardizing and harmonizing data at the EU-level. There are four main benefits of the draft regulation, which will better data quality and data-driven decision-making in the EU. First, the draft regulation creates consistent definitions that will eliminate gaps in information about unhoused and stateless residents. Second, it increases data sharing between member states and the EU, which will mitigate potential data-sharing issues during public emergencies. Third, the draft regulation requires member states regularly collect and

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[1] European Commission, "Proposal for a Regulation of the European Parliament and of the Council 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," January 20 2023, https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12958-Data-collection-European-statistics-on-population-ESOP-_en.

[2] Daniel Castro and Travis Korte, "Data Innovation 101," Center for Data Innovation, November 3, 2013, https://datainnovation.org/2013/11/data-innovation-101/.

[3] Gillian Diebold, "Closing the Data Divide for a More Equitable U.S. Digital Economy" (Center for Data Innovation, August 2022), https://www2.datainnovation.org/2022-closing-data-divide.pdf.

update their data sets, which will make it easier to compare trends across the EU. And finally, it opens up the possibility of new ad hoc and regular data sets, both of which will be key ways to prevent inaccurate or inconsistent population information.

Creates Consistent Definitions

The framework succeeds in creating much-needed coherence in population statistics by harmonizing definitions in Article 2 and defining the population base in Article 3.[4] Differences in definition and documentation standards can create inconsistent or inaccurate statistical analyses. Poorly crafted definitions can also exclude certain groups from EU data.[5] For example, without consistent definitions for "usual residence" that include all types of dwellings, unhoused residents could be excluded from official statistics. Article 2 defines terms like "usual residence" and "living quarters" to include individuals who may not live in permanent structures as part of residency statistics.[6] Article 3 even defines the population base to include all persons with usual residence, regardless of citizenship or statelessness, as residents and part of a member state's population base.[7] By doing so, this framework includes not only EU citizens but unauthorized residents, stateless residents, and migrants in data collection efforts because they play a major role in demographic trends and immigration policy.

Increases Internal Data Sharing

The proposed regulation codifies an obligation for national authorities to share population data with other national authorities and Eurostat. Article 13 requires national authorities and Eurostat to share data for the purposes of developing higher-quality statistics.[8] This requirement will address the lack of data sharing from member states that has prevented data-driven decision making in the past.[9] For example, constraints on data sharing stifled the EU's ability to track the spread and extent of the COVID-19 pandemic in a timely manner.[10] Likewise, without supranational data sharing, EU policymakers currently lack information about EU citizens who

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[4] European Commission, "Proposal for a Regulation of the European Parliament and of the Council on European statistics on population and housing," Articles 2 and 3.

[5] Gillian Diebold, "Closing the Data Divide for a More Equitable U.S. Digital Economy."

[6] European Commission, "Proposal for a Regulation of the European Parliament and of the Council on European statistics on population and housing," Article 2.

[7] European Commission, "Proposal for a Regulation of the European Parliament and of the Council on European statistics on population and housing," Article 3.

[8] European Commission, "Proposal for a Regulation of the European Parliament and of the Council on European statistics on population and housing," Article 13.

[9] European Commission, "Commission Staff Working Document, Impact Assessment Report Accompanying the Proposal for a Regulation of the European Parliament and of the Council 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," January 20, 2023, https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12958-Data-collection-European-statistics-on-population-ESOP-_en.

[10] European Commission, "Impact Assessment Report Accompanying the Proposal for a Regulation of the European Parliament and of the Council on European statistics on population and housing."

migrate back to their home countries due to major events like Brexit or COVID-19.[11] Lastly, without data sharing, member states have struggled to attain updated information on Ukrainian residents in the EU.[12] Article 13's requirements to share data supranationally will minimize these issues because it requires Eurostat to create a secure data sharing infrastructure at the EU-level to ensure that any data sharing is kept confidential and secure but can also be used for public emergencies, social good, and other critical events.

Improves Data Timeliness

Out-of-date information can paint an incomplete or inaccurate picture. For example, most EU-level and member-state demographic data collections do not report data quick enough to handle relevant issues, such as the COVID-19 pandemic or the invasion of Ukraine.[13] Articles 6 and 7 will help ensure member states regularly collect and update statistics. Article 6 will help minimize this problem by forcing member states to produce population statistics on a regular and harmonized time frame.[14] Article 7 will empower the Commission to request ad hoc datasets from member states for additional statistical needs and receive them in a timely manner.[15]

Expands Data Sources

The proposed regulation also increases the depth and breadth of data sources used by European statistical agencies. Article 9 empowers member states to develop new data sources and data methods for population and housing statistics as long as they meet the quality requirements laid out in Article 12, which includes requiring member states to effectively capture and estimate hard-to-reach population groups while reducing the risk of double- or under-counting.[16] Article 14 importantly lays out pilot studies needed to assess data source quality for new topics and understand existing asymmetries.[17]

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[11] European Commission, "Impact Assessment Report Accompanying the Proposal for a Regulation of the European Parliament and of the Council on European statistics on population and housing."
[12] European Commission, "Impact Assessment Report Accompanying the Proposal for a Regulation of the European Parliament and of the Council on European statistics on population and housing."
[13] European Commission, "Impact Assessment Report Accompanying the Proposal for a for a Regulation of the European Parliament and of the Council on European statistics on population and housing."
[14] European Commission, "Proposal for a Regulation of the European Parliament and of the Council on European statistics on population and housing," Article 6.
[15] European Commission, "Proposal for a Regulation of the European Parliament and of the Council on European statistics on population and housing," Article 7.
[16] European Commission, "Proposal for a Regulation of the European Parliament and of the Council on European statistics on population and housing," Articles 9 and 12.
[17] European Commission, "Proposal for a Regulation of the European Parliament and of the Council on European statistics on population and housing," Article 14.

TARGETED CHANGES CAN FURTHER ADDRESS THE DATA DIVIDE

The proposed regulation largely succeeds at improving statistical data in European Statistical agencies. However, policymakers should further improve the regulation's efforts to address the data divide by creating a definition for "hard-to-reach populations.

Create A Definition for "Hard-to-Reach" Populations

Despite the focus on bolstering inclusion, Article 2 of the proposed regulation does not define "hard-to-reach" population groups, despite the emphasis in Recitals 6 and 11 on ensuring equal and deep data on relevant social groups.[18] Likewise, Recital 29 acknowledges the issues with migrant data, including the asymmetries in cross-border migration, and difficulties in measuring immigrant, homeless, or stateless populations.[19] Creating a definition for "hard-to-reach" groups will make it clear who falls under this definition. For example, policymakers should use Article 2 to ensure that EU-level and member-state datasets better reflect people with disabilities who are not reliably represented in population statistics.[20] Closing these data gaps will help ensure that policy meets the unique needs of these individuals. Policymakers should further clarify what appropriate measures will help capture or estimate data for these "hard-to-reach" groups for statistics on migration, housing stock, fertility, and mortality.

CONCLUSION

The proposed regulation on European statistics on population and housing will improve statistical data in the EU. However, the Center encourages the European Commission to use this opportunity to also address the EU's data divide.

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[18] European Commission, "Proposal for a Regulation of the European Parliament and of the Council on European statistics on population and housing," Recitals 6 and 11; European Commission, "Proposal for a Regulation of the European Parliament and of the Council on European statistics on population and housing," Article 2.

[19] European Commission, "Proposal for a Regulation of the European Parliament and of the Council on European statistics on population and housing," Recital 29.

[20] Haydn Hammersley, "Feedback from: European Disability Forum (EDF) on Data collection — European statistics on population (ESOP)," May 4, 2021, https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12958-Data-collection-European-statistics-on-population-ESOP-/F2256775_en.