



Measurement and Reduction of Administrative Burdens in 13 sectors in Greece

Final Report Statistics



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Acronyms and Abbreviations

The list below provides the abbreviations used throughout the report. All terms related to the Standard Cost Model (SCM) method are described in detail in the Greek SCM ‘Manual for the implementation of the Standard Cost Model in Greece’

AB	Administrative Burden
AC	Administrative Cost
BAU	Business As Usual
CC	Consultancy Cost
EL.STAT	Hellenic Statistical Authority
ERP	Enterprise Resource Planning
ESS	European Statistical System
f	Frequency
GSIS	General Secretariat of Information System of the Ministry of Finance
INTRASTAT	A system for collecting information and producing statistics on the trade in goods between member states of the European Union
IO	Information Obligation
NEB	Normally Efficient Business
NSI	National Statistical Institute
OOP	Out of Pocket cost
P	Price
PA	Priority Area (in Greek SCM also referred to as ‘Sector’)
PRODCOM	A survey, with at least annual frequency, for the collection and dissemination of statistics on the production of industrial (mainly manufactured) goods, both in value and quantity terms, in the European Union
Q	Quantity

Executive summary

This report presents the findings from the measurement of the selected information obligations in the priority area Statistics, together with recommendations to reduce administrative burdens.

The measurement involved interviews with businesses and experts. The information obligations selected for Statistics form the eleventh largest proportion of administrative costs and burdens in this project. They represent a **total administrative cost of EUR 8.16 million to businesses in Greece** which has all been classified as administrative burden because there is no business-as-usual cost which businesses would be likely to continue to incur if the obligations did not exist.

The following recommendations are made as an action plan to reduce administrative costs and burdens in the selected Statistics obligations¹:

Recommendation	Calculated reduction in administrative costs	Calculated reduction in administrative burdens
Expand portal for electronic submission of survey data using electronic questionnaires*	EUR 665 558	EUR 665 558
Reduce duplication and overlapping between questionnaires*	EUR 482 210	EUR 482 210
Use of accounting data and data from administrative sources*	EUR 2 085 665	EUR 2 085 665

EL.STAT, in common with other EU statistical authorities, upholds the European Statistics Code of Practice which emphasises its professional independence and commitment to quality in statistics, as well as a clear commitment to reduce the reporting burden on business over time. The following recommendations are in accordance with the Code of Practice.

The recommendation to **expand the portal for online submission of survey data using electronic questionnaires** would allow businesses to submit their responses to EL.STAT surveys more cheaply and conveniently. It is already used for the submission of INTRASTAT and waste data.

The recommendation to **reduce duplication and overlapping between questionnaires** is aimed at reducing the amount of information which businesses submit to EL.STAT in the structural business survey and job vacancy and labour cost survey as a result of EL.STAT departments exploiting further the opportunity to share information provided on different survey questionnaires, where this is possible. There could also be opportunities to reduce the amount of administrative information requested by ministries and other public services if they involve EL.STAT in reviewing the information they currently request and understand better where published statistical information could be used to replace information currently gathered separately.

¹ In line with standard practice, the reduction calculations have been made individually for each recommendation. It is therefore not possible to add together these calculated reductions to obtain an overall total reduction because different recommendations affect the same obligations. The overall reduction obtained depends on the sequencing of recommendations. The impact of the recommendations marked * would be reduced by the other recommendations being implemented, and the impact of recommendations which are not marked would be affected similarly by prior implementation of the recommendations marked *.

The recommendation to **use accounting data and data from administrative sources** would reduce the amount of specific information requested from businesses by requiring submission of financial data in a standardised format which could be used by EL.STAT for different purposes. It would also reduce the amount of specific information requested from businesses by making greater use of data collected by other public authorities. These authorities would be required by EL.STAT to provide the information for statistical purposes, following an assessment by the statistical authority that the data met relevant quality criteria.

The **implementation of recommendations** in the Statistics area should be given lower priority compared to other sectors examined in the project because the changes have lower impact overall than changes in most other sectors, and because they must be made while supporting the provision of quality statistics which are important both nationally and at a European level.

Different and **additional concerns** were raised by stakeholders about obligations in the priority area Statistics. These are included to provide additional material for the Greek authorities to consider further measures to simplify and reduce administrative burdens and irritation.

The measurement covered the following selected obligations in the priority area Statistics:

Obligation to provide data in response to EL.STAT surveys on the structure of businesses.

Obligation to provide data in response to the EL.STAT survey on production and sales of manufactured goods.

Obligation to provide data in response to the EL.STAT survey on the trading of goods between Greece and other EU Member States (Intrastat)

Obligation to provide data in response to the EL.STAT survey on job vacancies and labour costs (different questionnaires)

We are grateful to the Federation of Hellenic Enterprises (SEV) for providing a copy of the study completed by the e-Government forum in 2009 on the use of ICT for the submission and better exploitation of statistical data from businesses.

1. Introduction

1.1. Background

The Ministry of Administrative Reform and e-Government of the Hellenic Republic (“the Ministry”) and the Organisation for Economic Co-operation and Development (“the OECD”) signed a Contribution Agreement in the last quarter of 2012 for OECD to carry out this project to measure and reduce administrative burdens in 13 key sectors of the Greek economy.

The project is expected to provide independent assessment, using the Greek modification of the internationally-recognised Standard Cost Model (“SCM”), to help to identify shortcomings and unnecessary administrative burdens for business in the regulatory environment that hinder the functioning of markets, damaging long-term growth and limiting benefits to corporate and household consumers. The SCM is a method for determining the administrative costs for business imposed by regulation. The SCM breaks down regulation into a range of manageable components that can be measured. The SCM neither addresses nor questions the policy objectives of each piece of regulation. As such, the measurement and analysis focus only on the administrative activities that must be undertaken in order to comply with regulation, not on the benefits that accrue from the legislation.

Economic recovery in any country is partly hampered by the quality of the regulatory framework. In 2006, the European Commission estimated that administrative costs amounted to approximately 6.8% of Greek GDP, and that a reduction of 25% in administrative costs in Greece might yield benefits of an increase of up to 2.4% of GDP by 2025.

This report describes the situation regarding administrative costs and administrative burdens at 1 September 2013 for the Statistics priority area. It was prepared by the OECD Secretariat in co-operation with Capgemini Consulting Netherlands and Deloitte Business Solutions SA Greece, and, for legal analysis, in co-operation with Christos Rovlias Law Office. The report gives an overview of the measurement results of the burden in the Statistics priority area and makes specific recommendations to reduce administrative burdens in this area.

1.2. Project approach

The project covers information obligation (IOs) stemming from different laws and regulations grouped into 13 Sectors or priority areas (PAs):

1. Agriculture and agricultural subsidies
2. Annual accounts/company law
3. Energy
4. Environment
5. Fisheries
6. Food safety
7. Pharmaceutical legislation
8. Public procurement
9. Statistics
10. Tax law (VAT)
11. Telecommunications
12. Tourism
13. Working environment/employment relations

The project uses the Greek Standard Cost Model (SCM) methodology as its basis and is structured in the following five phases.

1. Screening and collection of sector relevant laws and regulations

2. Qualitative scan of mapped regulations
3. Quantitative measurement of administrative burdens selected
4. Formulation of recommendations for redesigning/abolishing (parts of) laws and regulations
5. Publication and exploitation

The first phase of the project concerned the screening and selection of relevant laws and regulations by means of desk research. The result of this step was an overview of all regulations potentially causing administrative burdens in the 13 different Priority Areas.

Based on this overview, a qualitative scan of the mapped regulations was performed in order to identify the most likely burdensome and/or irritating areas. This scan, accompanied with additional meetings with key stakeholders, resulted in a selection of obligations for in-depth assessment.

The final report covers in depth stages 3 and 4: the results from the work undertaken under the quantitative measurement of administrative burdens stemming from selected laws and regulations and the formulation of recommendations to reduce administrative burdens in the Priority Area Statistics.

More precisely this report contains:

- A description of the IOs and respective laws and regulations in measurement scope for the priority area Statistics
- The main findings of the measurement
- Recommendations with quantified reduction proposals

This report does not include a detailed description of the methodology followed in the different stages. An analysis of the measured IOs within this priority area is in Annex 1.

The words “businesses” and “companies” are used interchangeably throughout this report. Where necessary, the term “businesses” includes sole traders and freelancers.

1.3.Methodology

The methodology used during this project is based on the ‘Manual for the implementation of the Standard Cost Model in Greece’. A short introduction to the main characteristics of the measurement approach is presented below.

The Standard Cost Model Manual (SCM) is a widely recognised method to calculate administrative burdens, which has been applied in many international projects from 2002 onwards. The model breaks down administrative costs imposed by legal acts into components that can be assessed with reasonable accuracy. The tool is characterised by the economic approach to law-making and regulation. Its aim is to identify all obligations arising from specific legislation, which render the law and procedures particularly aggravating to the functioning of the market and the economy.

The methodology neither addresses nor questions the fundamental objectives of legislation. Instead, the measurement focuses only on the administrative activities that must be undertaken in order to comply with legislation. The scope of this measurement lies within measuring the administrative costs for business to be compliant.

The SCM method during this project focuses solely on the administrative costs for businesses. Thus, administrative costs are defined as the costs incurred by businesses in meeting IOs. An IO is defined as: “An obligation contained in legal, regulatory or other explanatory text of the public administration and which require from the company to provide data to public authorities or third parties, or to maintain data which can be made available to public authorities or others if requested. Moreover, obligation which imposes the above but has been adopted by the daily administrative practice in public services.”

Every IO has attributes that describe:

- Content of the data required or “data requirement” (what must be provided)
- Target group (the population that must provide it)
- The frequency of the obligation (when it must be provided)

IOs can stem from either EU legislation or from nationally implemented laws and regulations. This project focuses on both IOs stemming directly from EU legislation and on those stemming from the national implementation of EU legislation.

During stage two of the project particular attention has been paid to screening and identifying of “over-implementation” (or “gold-plating”) of an EU legal act at national level, in terms of additional IOs or procedural requirements, amended frequency, or population (i.e. coverage) as this could lead to an increase in administrative costs linked to the provisions of EU legislation, as well as national measures.

The SCM method distinguishes between information that would be collected and processed by business even in the absence of the legislation and information that is solely gathered for the purpose of the legal obligation. The former are called “business-as usual” (BAU) costs, the latter administrative burdens. Together, the administrative burdens and business-as-usual costs constitute the administrative costs on businesses.

Altogether, the total administrative costs for business are assessed on the basis of the average cost of the required administrative activity (Price) multiplied by the total number of occurrences of the obligation performed per year (Quantity). The cost is estimated by multiplying a standard tariff attributed to a specific employee type (base on average labour cost per hour including *pro rata* overheads) by the time per action (the internal costs). Where appropriate, other types of cost such as outsourcing/consulting costs, equipment or costs of supplies that can reasonably be attributed to an information obligation are taken into account (the external costs). Furthermore, for this measurement, “additional costs” (costs posted on businesses which do not stem from laws and regulations but which are faced as part of a specific IO) are separately taken into account. The quantity is calculated as the frequency of the required activities multiplied by the number of entities concerned. This results in the following core equation of the SCM method:

$$\sum P \times Q$$

Where

- P (Price) = Tariff \times Time
- Q (Quantity) = number of entities \times frequency.

In stage 3 of the project, interviews and expert assessments were conducted to estimate the time and other costs for businesses to comply with IOs. All results were standardised with the objective of

providing a single estimate of what would be required for a normally efficient business to complete each of the administrative activities in order to comply with the IO. Information on the quantity was gathered by public servants from government sources and desk research. If no Q was available or further work seemed necessary, an informed estimate was made by Capgemini Consulting Netherlands and Deloitte Business Solutions SA Greece.

It should be emphasised that the goal of the standardisation is not to average the cost data obtained through the interviews and/or expert assessments but to derive a plausible result for a normally efficient business for each IO. The SCM method defines a normally efficient business as a business within the target group that performs administrative activities required by the IO neither better nor worse than may be reasonably expected.

2. Introduction to priority area and overview of measurement results

This chapter presents the results of the mapping and selection of the measured IOs and an overview of the measurement results within this priority area.

2.1. Selection of IOs and respective laws and regulations

The table below provides the selection of IOs and the respective national laws and regulations and the relevant EU legislation which were identified and examined during the previous stages of the project and in which the selected IOs within the priority area Statistics are contained and/or in which they have a legal base.

Table 2.1 Regulatory Framework

Information Obligation	Legislation in scope
<p>IO 40: Obligation to provide data in response to EL.STAT surveys on the structure of businesses</p>	<p>Primary national legislation:</p> <p>Law 3832/2010 Greek Statistical System (GSS) Establishment of the Greek Statistical Authority (EL.STAT) as an Independent Authority, as amended by Law 3899/2010, Law 3943/2011, Law 4072/2012, Law 4111/2013 and Law 4182/2013</p> <p>Law 2392/96 Access by the General Secretary of EL.STAT. to administrative sources and records (Article 12)</p> <p>Secondary national legislation:</p> <p>Presidential Decree 226/2000 Regulations governing the General Secretariat of the National Statistical Service</p> <p>EL.STAT resolution ΓΠ-400/2012, Approval of the Regulations for the operation and management of EL.STAT</p> <p>EL.STAT resolution 9843/B2-704/2011, Approval of the Regulations on Statistical Obligations of the Agencies of the Hellenic Statistical System (ELSS)</p> <p>Annual EL.STAT resolutions approving the conduct of surveys in different sectors. Latest:</p> <p>EL.STAT resolution 2103/Γ4-176/2013, Approval, tender and award of surveys on the structure of businesses in the following sectors: a) wholesale – retail trading, transport and storage, commercial maritime, b) hoteling and food services, real asset management services, c) information, media, professional, scientific and technical activities, d) supply of services for the year 2012, approval of the use of statistical means and determination of</p>

	<p>payment</p> <p>EL.STAT resolution 3303/Γ3-196/2013, Approval, tender and award of survey on construction for the year 2012, approval of the use of statistical means and determination of payment</p> <p>EL.STAT resolution 3158/Γ3-176/2013, Approval, tender and award for the year 2012 of annual surveys on mining, industry, electricity, gas, water and wastewater treatment, approval of the use of statistical means and determination of payment</p> <p>EL.STAT resolution 3261/B2-261/29-03-2013, Approval of the Hellenic Statistical Program 2014-2016</p> <p>Ministerial Decision 2887/Γ5 – 445/2012 Approval, tender, award and allocation of the cost of the survey on the structure and remuneration of businesses, approval of the use of statistical means and determination of payment for the year 2012.</p> <p>Ministerial Decision 2958/Γ3 – 201/2012 Approval, tender, award for the year 2012 of the annual survey on construction, mining, industry, electricity, gas, water, approval of the use of statistical means and determination of payment.</p> <p>Ministerial Decision 3499/Γ4 – 382/2012 Approval, tender, award and allocation of the cost of the survey on the structure of businesses in the sector of commercial maritime for the year 2010, approval of the use of statistical means and determination of payment.</p> <p>Ministerial Decision 3502/Γ4 – 379/2012 Approval, tender and award of surveys on the structure of businesses in the following sectors: a) wholesale – retail trading, transport and storage, commercial maritime, b) hoteling and food services, real asset management services, c) information, media, professional, scientific and technical activities, d) supply of services for the year 2012, approval of the use of statistical means and determination of payment.</p> <p>Ministerial Decision 3503/Γ4 – 378/2012 Approval, tender and award of structural surveys on businesses of businesses in the following sectors: a) commerce b) real asset management services, c) information, media, professional, scientific and technical activities, d) supply of services for the year 2010, approval of the use of statistical means and</p>
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	<p>determination of payment.</p> <p>Ministerial Decision 6301/Γ3 – 288/2011 Approval, tender, award of the annual survey for the year 2010 on construction, mining, industry, electricity, gas, water, approval of the use of statistical means and determination of payment, as amended by MD 6772/Γ3- 553/2012.</p> <p>Ministerial Decision 8706/Γ3 – 759/2010 Approval, tender, award of the annual survey for business financing, approval of the use of statistical means and determination of payment for the year 2010</p> <p>EU legislation:</p> <p>Regulation EC 295/2008 of the European Parliament and of the Council of 11 March 2008 concerning structural business statistics</p> <p>Commission Regulation (EU) No 275/2010 of 30 March 2010 implementing Regulation (EC) No 295/2008 of the European Parliament and of the Council, as regards the criteria for the evaluation of the quality of structural business statistics</p> <p>Commission Regulation (EC) No 250/2009 of 11 March 2009 implementing Regulation (EC) No 295/2008 of the European Parliament and of the Council as regards the definitions of characteristics, the technical format for the transmission of data, the double reporting requirements for NACE Rev.1.1 and NACE Rev.2 and derogations to be granted for structural business statistics</p> <p>Commission Regulation (EC) No 251/2009 of 11 March 2009 implementing and amending Regulation (EC) No 295/2008 of the European Parliament and of the Council as regards the series of data to be produced for structural business statistics and the adaptations necessary after the revision of the statistical classification of products by activity (CPA)</p> <p>Regulation (EC) No 223/2009 of the European Parliament and of the Council of 11 March 2009 on European statistics and repealing Regulation (EC, Euratom) No 1101/2008 of the European Parliament and of the Council on the transmission of data subject to statistical confidentiality to the Statistical Office of the European Communities, Council Regulation (EC) No 322/97 on Community Statistics, and Council Decision 89/382/EEC, Euratom establishing a Committee on the Statistical Programmes of the European Communities</p>
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	<p>Commission Regulation (EC) No 97/2009 of 2 February 2009 implementing Regulation (EC) No 295/2008 of the European Parliament and of the Council concerning structural business statistics, as regards the use of the flexible module</p> <p>Commission Regulation (EU) No 275/2010 of 30 March 2010 implementing Regulation (EC) No 295/2008 of the European Parliament and of the Council, as regards the criteria for the evaluation of the quality of structural business statistics</p> <p>Council Regulation (EEC) No 3037/90 of 9 October 1990 on the statistical classification of economic activities in the European Community, as amended by Commission Regulation 761/1993, Commission Regulation 29/2002, Regulation 1882/2003 and Regulation 1893/2006.</p> <p>European Statistics Code of Practice for the National and Community Statistical Services (28.9.2011)</p>
<p>IO 41: Obligation to provide data in response to the EL.STAT survey on production and sales of manufactured goods</p>	<p>Primary national legislation:</p> <p>Law 3832/2010 Greek Statistical System (GSS) Establishment of the Greek Statistical Authority (EL.STAT) as an Independent Authority, as amended by Law 3899/2010, Law 3943/2011, Law 4072/2012, Law 4111/2013 and Law 4182/2013</p> <p>Law 2392/96 Access by the General Secretary of EL.STAT. to administrative sources and records (Article 12)</p> <p>Secondary national legislation:</p> <p>Presidential Decree 226/2000 Regulations governing the General Secretariat of the National Statistical Service</p> <p>EL.STAT resolution ΓΠ-400/2012, Approval of the Regulations for the operation and management of EL.STAT</p> <p>EL.STAT resolution 9843/B2-704/2011, Approval of the Regulations on Statistical Obligations of the Agencies of the Hellenic Statistical System (ELSS)</p> <p>EL.STAT resolution 1276/Γ3-57/04.02.2013, Approval, tender and award of the annual survey on PRODCOM for 2012, approval of the use of</p>

	<p>statistical means and determination of payment</p> <p>Ministerial Decision 2950/Γ3 – 199/2012 Approval, tender and award of the annual survey on PRODCOM for the year 2011, approval of the use of statistical means and determination of payment for the year 2012.</p> <p>EL.STAT resolution 3261/B2-261/29-03-2013, Approval of the Hellenic Statistical Program 2014-2016</p> <p>EU legislation:</p> <p>Regulation EC No 3924/91 on the establishment of a Community survey of industrial production</p> <p>Commission Regulation (EC) No 912/2004 of 29 April 2004 implementing Council Regulation (EEC) No 3924/91 on the establishment of a Community survey of industrial production</p> <p>Commission Regulation (EU) No 936/2013 of 12 September 2013 establishing for 2013 the ‘Prodcom list’ of industrial products provided for by Council Regulation (EEC) No 3924/91</p> <p>Commission Regulation (EU) No 907/2012 of 20 August 2012 establishing for 2012 the ‘Prodcom list’ of industrial products provided for by Council Regulation (EEC) No 3924/91</p> <p>Regulation (EC) No 223/2009 of the European Parliament and of the Council of 11 March 2009 on European statistics and repealing Regulation (EC, Euratom) No 1101/2008 of the European Parliament and of the Council on the transmission of data subject to statistical confidentiality to the Statistical Office of the European Communities, Council Regulation (EC) No 322/97 on Community Statistics, and Council Decision 89/382/EEC, Euratom establishing a Committee on the Statistical Programmes of the European Communities</p> <p>European Statistics Code of Practice for the National and Community Statistical Services (28.9.2011)</p>
<p>IO 42: Obligation to provide data in response to the EL.STAT survey on trading of goods between Greece and other EU Member States (INTRASTAT)</p>	<p>Primary national legislation:</p> <p>Law 3832/2010 Greek Statistical System (GSS) Establishment of the Greek Statistical Authority (EL.STAT) as an Independent Authority, as amended by Law 3899/2010, Law 3943/2011, Law</p>

	<p>4072/2012, Law 4111/2013 and Law 4182/2013</p> <p>Law 2392/96 Access by the General Secretary of EL.STAT. to administrative sources and records (Article 12)</p> <p>Secondary national legislation:</p> <p>Presidential Decree 226/2000 Regulations governing the General Secretariat of the National Statistical Service</p> <p>EL.STAT resolution ΓΠ-400/2012, Approval of the Regulations for the operation and management of EL.STAT</p> <p>EL.STAT resolution 9843/B2-704/2011, Approval of the Regulations on Statistical Obligations of the Agencies of the Hellenic Statistical System (ELSS)</p> <p>EL.STAT resolution 3261/B2-261/29-03-2013, Approval of the Hellenic Statistical Program 2014-2016</p> <p>EU legislation:</p> <p>Regulation (EC) No 638/2004 of the European Parliament and of the Council of 31 March 2004 on Community statistics relating to the trading of goods between Member States and repealing Council Regulation (EEC) No 3330/91, as amended by Regulation (EC) 222/2009 and Commission Regulation (EU) No 1093/2013</p> <p>Commission Regulation (EC) No 1982/2004 of 18 November 2004 implementing Regulation (EC) No 638/2004 of the European Parliament and of the Council on Community statistics relating to the trading of goods between Member States and repealing Commission Regulations (EC) No 1901/2000 and (EEC) No 3590/92, as amended by Regulation (EC) 1915/2005, Regulations 90 and 91/2010 and Commission Regulation (EU) No 1093/2013.</p> <p>Regulation (EC) No 223/2009 of the European Parliament and of the Council of 11 March 2009 on European statistics and repealing Regulation (EC, Euratom) No 1101/2008 of the European Parliament and of the Council on the transmission of data subject to statistical confidentiality to the Statistical Office of the European Communities, Council Regulation (EC) No 322/97 on Community Statistics, and Council Decision 89/382/EEC, Euratom establishing a Committee on the Statistical</p>
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	<p>Programmes of the European Communities</p> <p>European Statistics Code of Practice for the National and Community Statistical Services (28.9.2011)</p>
<p>IO 43: Obligation to provide data in response to the EL.STAT survey on job vacancies and labour cost</p>	<p>Primary national legislation:</p> <p>Law 3832/2010 Greek Statistical System (GSS) Establishment of the Greek Statistical Authority (EL.STAT) as an Independent Authority, as amended by Law 3899/2010, Law 3943/2011, Law 4072/2012, Law 4111/2013 and Law 4182/2013</p> <p>Law 2392/96 Access by the General Secretary of EL.STAT. to administrative sources and records (Article 12)</p> <p>Secondary national legislation:</p> <p>Presidential Decree 226/2000 Regulations governing the General Secretariat of the National Statistical Service</p> <p>EL.STAT resolution ΓΠ-400/2012, Approval of the Regulations for the operation and management of EL.STAT</p> <p>EL.STAT resolution 9843/B2-704/2011, Approval of the Regulations on Statistical Obligations of the Agencies of the Hellenic Statistical System (ELSS)</p> <p>EL.STAT resolution 3805/Γ5-582/12.04.2013, approving the conduct of survey on job vacancies and labour cost and employment indices in enterprises</p> <p>EL.STAT resolution 1075/Γ5-126/28.01.2013, approving the conduct of survey on job vacancies and labour cost and employment indices in enterprises</p> <p>Ministerial Decision 1075/Γ5-126/28.01.2013, approving the conduct of survey on job vacancies and labour cost and employment indices in enterprises</p> <p>Ministerial Decision 2888/Γ5-446/11.04.2012, Approval, tender, award and allocation of the annual survey for the year 2012, on job vacancies and labour cost and employment indices in enterprises, approval of the use of statistical means and determination of payment.</p> <p>EL.STAT resolution 3261/B2-261/29-03-2013,</p>

	<p>Approval of the Hellenic Statistical Program 2014-2016</p> <p>EU legislation:</p> <p>Regulation EC No 453/2008 on quarterly statistics on Community job vacancies</p> <p>Commission Regulation (EC) No 19/2009 of 13 January 2009 implementing Regulation (EC) No 453/2008 of the European Parliament and of the Council on quarterly statistics on Community job vacancies, as regards the definition of a job vacancy, the reference dates for data collection, data transmission specifications and feasibility studies</p> <p>Commission Regulation (EC) No 698/2006 of 5 May 2006 implementing Council Regulation (EC) No 530/1999 as regards quality evaluation of structural statistics on labour costs and earnings, as amended by Commission Regulation 1022/2009</p> <p>Regulation EC No 450/2003 concerning the labour cost index, as amended by Regulations EC 1893/2006 and 596/2009</p> <p>Regulation EC No 530/1999 concerning structural statistics on earnings and on labour costs, as amended by Regulations (EC) 1882/2003, 1893/2006 and 596/2009</p> <p>Commission Regulation (EC) No 1726/1999 of 27 July 1999 Implementing Council Regulation (EC) No 530/1999 concerning structural statistics on earnings and on labour costs as regards the definition and transmission of information on labour costs, as amended by Regulations (EC) 1737/2005 and 973/2007</p> <p>Council Regulation (EC) No 1165/98 of 19 May 1998 concerning short-term statistics</p> <p>Regulation (EC) No 223/2009 of the European Parliament and of the Council of 11 March 2009 on European statistics and repealing Regulation (EC, Euratom) No 1101/2008 of the European Parliament and of the Council on the transmission of data subject to statistical confidentiality to the Statistical Office of the European Communities, Council Regulation (EC) No 322/97 on Community Statistics, and Council Decision 89/382/EEC, Euratom establishing a Committee on the Statistical Programmes of the European Communities</p> <p>European Statistics Code of Practice for the</p>
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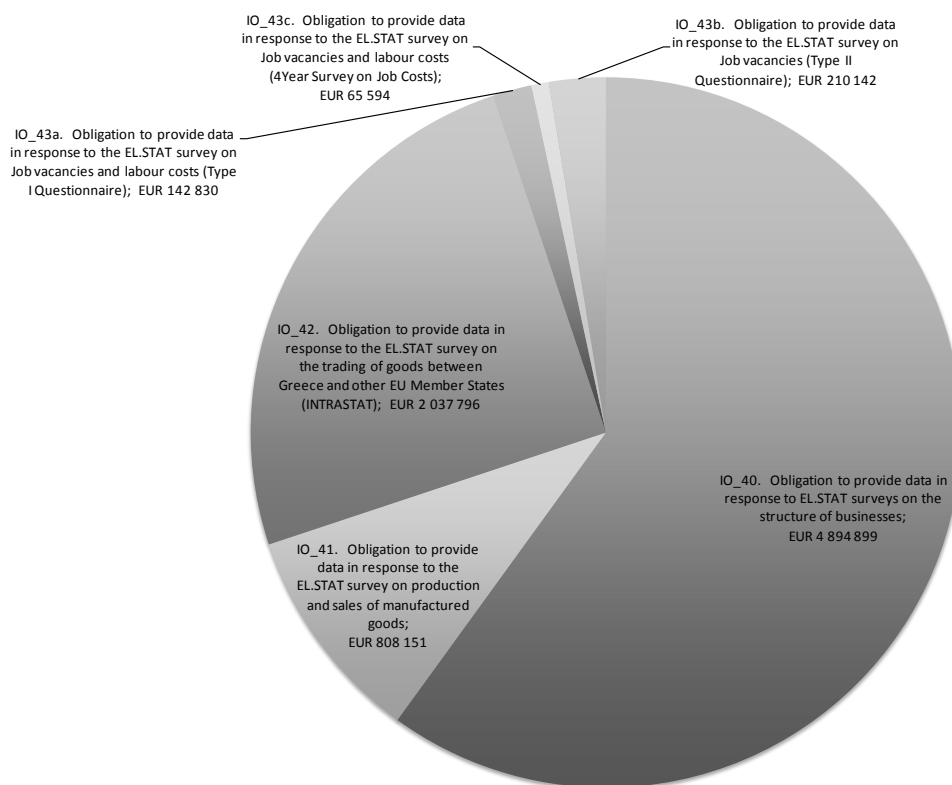
	National and Community Statistical Services (28.9.2011)
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2.2. High level measurement results

The total administrative cost for the Priority Area Statistics is **EUR 8.16 million**. No BAU costs are assumed and therefore, the administrative burdens amount to EUR 8.16 million (100%) for the Priority Area.

The pie chart below provides the high-level findings of the measurement. It contains the administrative cost per information obligation within this priority area.

Figure 2.1 Total identified Administrative Cost for the priority area



The most burdensome IOs within this Priority Area are the obligation to reply to surveys on the structure of businesses, followed by the obligation to provide data on trading of goods between Greece and other EU Member States (INTRASTAT). The obligation to provide data on the production and sales of goods (PRODCOM) and the obligation to provide data on Job Vacancies and Job Costs are less burdensome.

The Information Obligations, as well as the laws and regulations of the Priority Area in concern are diversified enough to cover a variety of costs within this Priority Area. They do differ in terms of benefit for society, governance structure and/or target group. Comparing several IOs in terms of administrative cost therefore creates a picture that must be interpreted with considerable caution. The figure above presents the share of administrative cost per IO as part of the total administrative cost in the Priority Area Statistics. The unit of comparison in the figure is total administrative cost.

Furthermore, this measurement covers only a selection of all legislation relevant to the Priority Area. Therefore, additional administrative cost and burden exist that has not been covered by the measurement. A detailed description of the origin, process and measurement results of the IOs is presented in Annex 1.

3. Action Plan and Recommendations for Priority Area Statistics

This chapter describes the consideration of alternatives to the current situation for the IOs measured. It makes and quantifies recommendations to simplify the current situation and reduce administrative burdens. It also describes the suggested sequencing and prioritisation of the reduction proposals and suggested ways to facilitate their implementation. The recommendations are explained in detail and quantified on the basis of previous experiences and expert assessments.

The recommendations to reduce administrative burdens and costs in the priority area Statistics are calculated to reduce administrative costs and burdens by the following amounts:

Recommendation	Calculated reduction in administrative costs	Calculated reduction in administrative burdens
Expand portal for electronic submission of survey data using electronic questionnaires*	EUR 665 558	EUR 665 558
Reduce duplication and overlapping between questionnaires*	EUR 482 210	EUR 482 210
Use of accounting data and data from administrative sources*	EUR 2 085 665	EUR 2 085 665

Note that adding together the individual reduction calculations for each recommendation gives an understanding of the magnitude of the potential reduction, rather than an exact figure. In line with standard practice, the reductions are calculated separately for each recommendation based on the costs as measured for this project. The impact of the recommendations marked * would be reduced by the other recommendations being implemented in advance, and the impact recommendations which are not marked would be affected similarly by prior implementation of the unmarked recommendations.

3.1. Identification of potential simplification and reduction options

During stage 4 of the project, potential simplification and reduction options were identified as appropriate from the views of businesses expressed during the measurement stage, stakeholder views, experience of other administrative burden reduction exercises, and the views of the teams of Greek public servants involved in the project.

Potential simplification and reduction options were developed by Greek public servants on the basis of a structured questionnaire developed by the OECD using the “IO Burden Reduction Pyramid” which was developed by the Capgemini, Deloitte and Ramboll consortium as part of the EU project on baseline measurement and reduction of administrative costs in 2009-10. The questionnaire asked public servants to respond to the following prompts, in order, about each IO measured:

1. What is the policy goal of the IO?
2. Option A: Remove completely this IO in order to reduce administrative burdens (arguments in favour, arguments against, conclusion)
3. Option B: Redesign public administration processes in this IO to reduce administrative burdens (identify opportunities for public administration to act in a less burdensome way, and conclude which appear most suitable)

4. Option C: Target the IO more precisely to the policy goal (identify less burdensome ways to meet the policy goal identified, and conclude which appear most suitable)
5. Option D: Make the IO as flexible as possible for business (identify ways to make complying with the IO more flexible for business, and conclude which appear most suitable)
6. Option E: Reduce the variables in the SCM equation: Population, frequency, time and tariff (identify possible changes to each of the four variables, and conclude which appear most suitable)

This provided a structured way to consider larger reforms ahead of smaller reforms, and ensured that attention was not only on small changes to the variables of the SCM equation.

3.2. Recommendations for the priority area Statistics

Certain measures from the potential simplification and reduction measures were examined further in order to develop a compatible set of recommendations for the project which could form a coherent action plan for administrative burden reduction for the project. The potential measures which have been developed into recommendations are those which appear to have the potential to make meaningful reductions to administrative burdens or irritation factors, and which appear to be compatible with the overall policy goals of the obligations.

The recommendations are presented individually in the remainder of this section. The background to each recommendation is described, as well as the current situation as presented to the project and the desired future situation which would happen if the recommendation was implemented. A list of the relevant parts of legislation and regulation which would need to be considered for amendment is included. This is based on the project team's assessment of the original legal mapping done by the Greek public servants in Stage 1 of the project, and also on additional legal analysis in order to identify relevant provisions and compatibility with EU law. Finally, an assessment is made of the likely reduction in administrative burdens which would result from the implementation of each recommendation.

As is common practice in administrative burdens exercises, the reduction in administrative burdens for each recommendation is provided independently, i.e. the reduction is calculated on the basis of the implementation of each recommendation from the current situation, and no account is taken of the combined effect of recommendations. This means that the total reduction in administrative burdens which would be achieved by implementing all recommendations cannot be calculated by simply adding together the reductions for each recommendation; further analysis would be required once it was clear which recommendations would be implemented.

3.2.1. Expand portal for electronic submission of survey data using electronic questionnaires

Summary of recommendation

The implementation of this recommendation is calculated to reduce administrative burdens by EUR 665 558 and administrative costs by the same amount on a stand-alone basis.

EL.STAT should continue to develop the web portal which allows businesses to submit survey data electronically in response to electronic survey questionnaires.

Business would spend less time completing questionnaires, reviewing and submitting data.

IOs affected

This recommendation reduces administrative costs primarily for the following Information Obligations:

IO 40: Obligation to provide data in response to EL.STAT surveys on the structure of businesses

IO41: Obligation to provide data in response to the EL.STAT survey on production and sales of manufactured goods

IO43: Obligation to provide data in response to the EL.STAT survey on job vacancies and labour cost

Background and rationale

The European Statistics Code of Practice for the National and Community Statistical Authorities sets the standards for developing, producing and disseminating European statistics, and applies to the National Statistical Institutes (NSI) and other national authorities in the European Statistical System (ESS) which develop, produce and disseminate European statistics.² EL.STAT is the Greek NSI.

The first principle of the Code of Practice is the professional independence of statistical authorities from other policy, regulatory or administrative departments and bodies, as well as from private sector operators. Other principles include the mandate for data collection, adequacy of resources, commitment to quality, statistical confidentiality, and impartiality and objectivity.

The ninth principle of the Code of Practice is the non-excessive burden on respondents, which includes ensuring the reporting burden is “*proportionate to the needs of the users and is not excessive for respondents*”.³ Indicator 9.3 includes the suggestion that the information sought from businesses should be returned by electronic means where feasible.

We understand from our discussions with EL.STAT that the authority appreciates the importance of the ninth principle and has been taking action over past years to reduce the administrative burdens on business of the gathering of data for statistical purposes. EL.STAT already has plans to extend the use of electronic questionnaires and to upgrade the operability and content of the existing web application. Indicative actions are listed in the Hellenic Statistical Program 2014-2016⁴, and include the development of a web application for data collection for the PRODCOM survey.

² see http://epp.eurostat.ec.europa.eu/portal/page/portal/quality/code_of_practice/

³ see http://epp.eurostat.ec.europa.eu/cache/ITY_OFFPUB/KS-32-11-955/EN/KS-32-11-955-EN.PDF

⁴ see

http://www.statistics.gr/portal/page/portal/ESYE/BUCKET/General/A6_TRIETES_STATISTIKO_PROGRAMMA_2014_2016_EN.PDF

Currently, for the surveys mentioned above, businesses generally complete questionnaires manually, which increases the time taken to complete and review the questionnaires before their submission. On the basis of the measurement, we found that a normally efficient large business spends 2 hours completing the questionnaire for the structural business statistics, while a normally efficient small business spends 45 minutes. Businesses spend 1.4 hours completing the questionnaire on the production and sales of manufactured goods. This time is in addition to the time spent gathering the data required. Businesses reported that the lack of an online electronic reporting system was irritating. For INTRASTAT data (IO 42), businesses submit data on the EL.STAT website and there is an option to upload batch data from ERP systems, but for the other surveys measured, data is submitted on questionnaire forms. The portal also operates for the submission of waste statistics.

Electronic questionnaires and the creation of an electronic portal for the submission of survey responses to EL.STAT will reduce the time needed for filling out questionnaire forms, the review of data, and the actual submission of data. EL.STAT has already begun work of the development of electronic questionnaires and online applications.

We therefore recommend that EL.STAT continues to develop electronic questionnaires and submission systems. These should include a single portal (“front end”) for the submission of data electronically to the authority for businesses, since standardisation will also help businesses to become familiar with the way to submit information. EL.STAT should also work with businesses to identify where it saves businesses significant time and effort to upload files which are outputs of standard IT systems, and consider including this possibility.

This technique can be used by EL.STAT for additional surveys and not only those studied in this project.

The rate of response should also increase if data submission is made easier. This is an additional benefit for the authority, and also it reduces administrative burdens on business, because the SCM methodology assumes 100% compliance. In the case of statistical surveys, this means that the total administrative burden on business assumes every respondent replies. There may also be further benefits to the authority from receiving information in this way, including easier sharing of information between departments and less processing and data entry within the authority.

Description of current situation

Businesses which have been included in the survey sample (for the case of IO40 and IO43) as well as manufacturing businesses with more than 10 staff (for the case of IO41) receive a questionnaire from EL.STAT.

Businesses retrieve data from various IT systems and records and they “transfer” data onto the questionnaires.

The businesses submit the completed questionnaires to EL.STAT usually via email or fax.

Description of desired situation

Companies receive a notice to complete a questionnaire at a specified portal. Access credentials are also provided.

Companies retrieve data from various IT systems and records and then they access the portal in order to complete and submit electronic questionnaires.

Structured electronic data is received by EL.STAT.

Legislation to be examined

In order for the recommendation to be implemented and the future EL.STAT surveys to be carried out accordingly, the following national legislation and resolutions should be examined and/or reviewed, taking into account also the relevant legislation and resolutions at the EU level in this priority area. (This does not imply that an amendment must necessarily be made.)

National legislation and resolutions

EL.STAT resolution 3261/B2-261/29-03-2013, Approval of the Hellenic Statistical Program 2014-2016, Frame 4: Three-year programme for the training of EL.STAT staff

EL.STAT resolution 9843/B2-704/2011, Regulations on Statistical Obligations of the Agencies of the Hellenic Statistical System (ELSS), Article 4 (basic principles and obligations) par. 1, Article 7 (Quality of statistics) par. 1

Annual EL.STAT resolutions for the conduct of relevant surveys (latest for IO43 EL.STAT resolution 3805/Γ5-582/12.04.2013, approving the conduct of survey on job vacancies and labour cost and employment indices in enterprises, for IO41 EL.STAT resolution 1276/Γ3-57/04.02.2013, approving the conduct of survey on PRODCOM for 2012, and for IO40 EL.STAT resolution 2103/Γ4-176/2013, approving the conduct of survey on wholesale – retail trading etc., EL.STAT resolution 3303/Γ3-196/2013, approving the conduct of survey on construction, EL.STAT resolution 3158/Γ3-176/2013, approving the conduct of survey on mining, etc.

EU legislation and relevant code of practice

Regulation EC 295/2008 of the European Parliament and of the Council of 11 March 2008 concerning structural business statistics, Articles 2, 5, 6 par. 2.

Commission Regulation (EC) No 250/2009 of 11 March 2009 implementing Regulation (EC) No 295/2008 of the European Parliament and of the Council as regards the definitions of characteristics, the technical format for the transmission of data, the double reporting requirements for NACE Rev.1.1 and NACE Rev.2 and derogations to be granted for structural business statistics, Articles 1-4, Annex III

Commission Regulation (EU) No 275/2010 of 30 March 2010 implementing Regulation (EC) No 295/2008 of the European Parliament and of the Council, as regards the criteria for the evaluation of the quality of structural business statistics, Article 2

Council Regulation (EEC) No 3924/91 on the establishment of a Community survey of industrial production, Article 5

Regulation (EC) No 450/2003 of the European Parliament and of the Council of 27 February 2003 concerning the labour cost index, Articles 4-7

Regulation EC No 453/2008 on quarterly statistics on Community job vacancies, Article 4 par. 3, Article 5 par. 1

Council Regulation (EC) No 1165/98 of 19 May 1998 concerning short-term statistic, Articles 4, 8, 17 and annexes

Regulation EC No 530/1999 concerning structural statistics on earnings and on labour costs, Article 7 par. 1 and 3

Commission Regulation (EC) No 1726/1999 of 27 July 1999 Implementing Council Regulation (EC) No 530/1999, Article 2, Annex III

Regulation (EC) No 223/2009 of the European Parliament and of the Council of 11 March 2009 on European statistics , Articles 5 par. 1, 12, 18 par. 3

European Statistics Code of Practice for the National and Community Statistical Services

Assessment of impact on administrative costs and burdens

This change would affect businesses which respond to EL.STAT surveys on business structure, production and sales of manufactured goods, and job vacancies and labour costs. It could also be used for other surveys which EL.STAT conducts.

These businesses would:

- No longer be required to complete hard copy or Excel questionnaires and submit them by email or fax
- Be able to complete questionnaires online, with appropriate help, and in certain cases upload standard output files from other systems in order to reduce the information which is re-entered.

The establishment of electronic data entry has been estimated to lead to a reduction in time for the completion and submission of information, ranging from 20 minutes to 1 hour (for SMEs and non SMEs respectively) for IO40, 30 minutes for IO41 and up to 20 minutes for IO 43.

On this basis, the reductions in administrative burdens and costs for this recommendation have been calculated as a reduction of EUR 665 558 in administrative burdens and the same amount in administrative costs. This covers only the surveys mentioned, and not any benefits from applying the same approach to other surveys.

Total for this recommendation		
Measured relevant IOs:	Estimated future figures:	Reduction potential:
AB=EUR 1 226 719.19 AC=EUR 1 226 719.19	AB=EUR 1 085 477.31 AC=EUR 1 085 477.31	Reduction of EUR 665 558 AB EUR 665 558 AC

of which:

IO 40: Obligation to provide data in response to EL.STAT surveys on the structure of businesses		
Measurement results:	Estimated impact (future figures):	Potential reduction:
P (sum segments) = EUR 100.03 f= 1 Q= 48 933	P = EUR 89.32 f= 1 Q= 48 933	Reduction of 11% (of IO 40)

BAU= 0% AB=EUR 4 894 899.05 AC=EUR 4 894 899.05	BAU= 0% AB=EUR 4 370 583.38 AC=EUR 4 370 583.38	Reduction of EUR 524 315.67AB EUR 524 315.67 AC
IO 41: Obligation to provide data in response to the EL.STAT survey on production and sales of manufactured goods		
Measurement results: P = EUR 202.70 f= 1 Q= 3 987 BAU= 0% AB=EUR 808 151.61 AC=EUR 808 151.61	Estimated impact (future figures): P = EUR 188.43 f= 1 Q= 3 987 BAU= 0% AB=EUR 751 251.14 AC=EUR 751 251.14	Potential reduction: Reduction of 7% (of IO 41) Reduction of EUR 56 900.47 AB EUR 56 900.47 AC
IO 43: Obligation to provide data in response to the EL.STAT survey on job vacancies and labour cost		
Measurement results: P (sum segments) = EUR 18.56 f= 2.2 Q= 10 212 BAU= 0% AB=EUR 418 567.58 AC=EUR 418 567.58	Estimated impact (future figures): P = EUR 14.82 f= 2.2 Q= 10 212 BAU= 0% AB=EUR 334 226.17 AC=EUR 334 226.17	Potential reduction: Reduction of 20% (of IO 43) Reduction of EUR 84 341.41AB EUR 84 341.41 AC

3.2.2. Reduce duplication and overlapping between questionnaires

Summary of recommendation

The implementation of this recommendation is calculated to reduce administrative burdens by EUR 482 210 and administrative costs by the same amount on a stand-alone basis.

EL.STAT should eliminate duplication in the questionnaires for the structural business statistics and the job vacancies and labour costs surveys. The relevant Ministries should also revise their own administrative data collection in the areas covered by these surveys, and involve and collaborate with EL.STAT from an early stage in the review, in order to reduce overlapping between administrative and statistical data collection. This review should include the linking of data sources where possible.

IOs affected

This recommendation reduces administrative costs primarily for the following Information Obligations:

IO 40: Obligation to provide data in response to EL.STAT surveys on the structure of businesses

IO43: Obligation to provide data in response to the EL.STAT survey on job vacancies and labour cost

Background and rationale

Businesses noted during measurement that identical or similar data was required from them in different EL.STAT surveys, and also by other authorities in administrative data collection. The issue which arises is therefore duplication of information requested by EL.STAT and also the duplication between information requested by EL.STAT and information requested by other authorities.

The principle of statistical confidentiality is important in considering how to approach this issue. Statistical confidentiality involves an absolute guarantee to all those who provide data to NSIs (for example, businesses, households, administrations and other respondents to surveys) that the information they provide is confidential and is used only for statistical purposes. This places restrictions on the way that NSIs can share statistical information and detailed data with others, including in the public administration.

This means that two different approaches are required to reduce overlap: one between statistical surveys, and another between statistical surveys and administrative data.

Examples of overlap identified by businesses between EL.STAT surveys included the survey questionnaires on the structure of business (IO40) which include sections about employment, worked hours and payroll data. These issues are covered more extensively in questionnaires for the surveys for job vacancies and labour costs (IO43).

EL.STAT has also conducted work to identify areas of overlap between surveys, and we recommend a specific review with a view to eliminating overlap between the structural business questionnaires and the job vacancy and labour costs questionnaires. This should include an examination of the possibility linking of data sources between these surveys.

The relevant Ministries (notably Development and Labour) also collect administrative data which appears to overlap with the content of these surveys. They should re-examine the use they make of this data with a view to eliminating its direct collection from businesses if the Ministries could use the published statistical data for all or part of their needs. It is important that EL.STAT is involved in these reviews, and that the principle of statistical confidentiality is maintained, so Ministries should

not expect access to detailed data gathered for statistical purposes. These reviews could be combined with reviews of the quality and suitability of administrative data for statistical purposes (see section 3.2.4).

Description of current situation

The same variable is collected more than once across different surveys and questionnaires. Businesses which have been included in several survey samples (for the case of IO40 and IO43) are required to fill out questionnaires which include duplicate or similar information.

Businesses therefore prepare, review and submit data multiple times for different surveys.

There are also overlaps with data requested by other public authorities.

Description of desired situation

Questionnaires for the structural business surveys and job vacancies and labour cost surveys have been reviewed and reconciled so that duplication is limited only to cases where there is no alternative to preserve data correlation.

Ministries of Development and Labour have reviewed the administrative data they request from businesses with the assistance of EL.STAT and removed the requirements where their needs can be met by published statistical data.

Businesses are generally required to report data only once.

Legislation to be examined

In order for the recommendation to be implemented and the future EL.STAT surveys to be carried out accordingly, the following national legislation and resolutions should be examined and/or reviewed, taking into account also the relevant legislation and resolutions at the EU level in this priority area. (This does not imply that an amendment must necessarily be made.)

National legislation and resolutions

EL.STAT resolution 3261/B2-261/29-03-2013, Approval of the Hellenic Statistical Program 2014-2016, Frame 4: Three-year programme for the training of EL.STAT staff

EL.STAT resolution 9843/B2-704/2011, Regulations on Statistical Obligations of the Agencies of the Hellenic Statistical System (ELSS), Article 4 (basic principles and obligations) par. 1, Article 7 (Quality of statistics) par. 1

Annual EL.STAT resolutions for the conduct of relevant surveys (latest for IO43 EL.STAT resolution 3805/Γ5-582/12.04.2013, approving the conduct of survey on job vacancies and labour cost and employment indices in enterprises and for IO40 EL.STAT resolution 2103/Γ4-176/2013, approving the conduct of survey on wholesale – retail trading etc., EL.STAT resolution 3303/Γ3-196/2013, approving the conduct of survey on construction, EL.STAT resolution 3158/Γ3-176/2013, approving the conduct of survey on mining, etc.

EU legislation and relevant code of practice

Regulation EC 295/2008 of the European Parliament and of the Council of 11 March 2008 concerning structural business statistics, Articles 2, 5, 6 par. 2, Annexes I-IX.

Commission Regulation (EC) No 250/2009 of 11 March 2009 implementing Regulation (EC) No 295/2008 of the European Parliament and of the Council as regards the definitions of characteristics, the technical format for the transmission of data, the double reporting requirements for NACE Rev.1.1 and NACE Rev.2 and derogations to be granted for structural business statistics, Article 4, Annex III

Regulation EC No 530/1999 concerning structural statistics on earnings and on labour costs, Article 7 par. 1 and 3

Commission Regulation (EC) No 1726/1999 of 27 July 1999 Implementing Council Regulation (EC) No 530/1999, Article 2, Annex III

Regulation (EC) No 450/2003 of the European Parliament and of the Council of 27 February 2003 concerning the labour cost index, Article 4-7

Regulation EC No 453/2008 on quarterly statistics on Community job vacancies, Article 4 par. 3, Article 5 par. 1

Council Regulation (EC) No 1165/98 of 19 May 1998 concerning short-term statistic, Articles 4, 8, 17 and annexes

Regulation (EC) No 223/2009 of the European Parliament and of the Council of 11 March 2009 on European statistics , Articles 5 par. 1, 12, 18 par. 3

European Statistics Code of Practice for the National and Community Statistical Services

Assessment of impact on administrative costs and burdens

This change would affect businesses which respond to EL.STAT surveys on business structure, and job vacancies and labour costs. It would also affect them as they respond to requests for similar data from relevant Ministries, although this is not included in the estimated impact on administrative burdens.

These businesses would:

- No longer be required to provide similar and duplicate information when they respond to surveys for business structure and job vacancies and labour costs.

Non-SMEs spend significantly more time for IO40, as their structure of business is more complex compared to the SMEs. It is estimated that such a redesign could reduce the time spent on preparing and reviewing as well as completing questionnaires by 1.5 hours for non SMEs and 15 min for SMEs. The impact on IO43 is expected to be lower, i.e. 5-10 min for the completion of questionnaires of IO43, however this has to be considered against the backdrop of a higher frequency of submission of the individual questionnaires.

On this basis, the reductions in administrative burdens and costs for this recommendation have been calculated as a reduction of EUR 482 210 in administrative burdens and the same amount in administrative costs.

Total for this recommendation		
Measured relevant IOs:	Estimated future figures:	Reduction potential:

AB=EUR 5 313 466.63 AC=EUR 5 313 466.63	AB=EUR 4 831 256.23 AC=EUR 4 831 256.23	Reduction of EUR 482 210 AB EUR 482 210 AC
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of which:

IO 40: Obligation to provide data in response to EL.STAT surveys on the structure of businesses		
Measurement results: P (sum segments) = EUR 100.03 f= 1 Q= 48 933 BAU= 0% AB=EUR 4 894 899.05 AC=EUR 4 894 899.05	Estimated impact (future figures): P = EUR 90.84 f= 1 Q= 48 933 BAU= 0% AB=EUR 4 445 216.50 AC=EUR 4 445 216.50	Potential reduction: Reduction of 9% (of IO 40) Reduction of EUR 449 682.56 AB EUR 449 682.56 AC
IO 43: Obligation to provide data in response to the EL.STAT survey on job vacancies and labour cost		
Measurement results: P (sum segments) = EUR 18.56 f= 2.2 Q= 10 212 BAU= 0% AB=EUR 418 567.58 AC=EUR 418 567.58	Estimated impact (future figures): P = EUR 17.12 f= 2.2 Q= 10 212 BAU= 0% AB=EUR 386 039.73 AC=EUR 386 039.73	Potential reduction: Reduction of 8% (of IO 43) Reduction of EUR 32 527.85 AB EUR 32 527.85 AC

3.2.3. Use of accounting data and data from administrative sources

Summary of recommendation

The implementation of this recommendation is calculated to reduce administrative burdens by EUR 2 085 665 and administrative costs by the same amount on a stand-alone basis within the obligations measured.

EL.STAT should consider requiring businesses to submit their financial data in a standardised format, and then use this data for statistical purposes, allowing the authority to remove individual data requirements from a number of different surveys.

This would reduce the need for businesses to transpose data from their own systems to a number of different statistical survey responses, and would leave the survey to focus on the additional information which was not included in accounts data.

Under an appropriate legal framework and following assessments of the quality of data, EL.STAT should require access to administrative data, particularly from the General Secretariat for Information Systems (GSIS), Customs Offices and the Ministry of Labour, Social Security and Welfare, IKA, OAED and other authorities. There are also wider initiatives outside the scope of this project to suggest there would be benefits from requiring access to administrative data from the Ministry of Environment, Energy and Climate Change and the Ministry of Agriculture and Rural Development.

This administrative data, when suitable for statistical use, would reduce the amount of information which businesses must provide for a range of surveys, including the surveys on job vacancies and labour costs.

IOs affected

This recommendation reduces administrative costs primarily for the following Information Obligations:

IO 40: Obligation to provide data in response to EL.STAT surveys on the structure of businesses

IO43: Obligation to provide data in response to the EL.STAT survey on job vacancies and labour costs

Background and rationale

Currently, surveys require the submission of financial data (for example: revenue breakdown, employment costs, production costs, investments, procurement, energy consumption, other costs breakdown, assets analysis) which is extracted from financial data and transferred onto the questionnaires. Existing accounts data from companies can be used to reduce the amount of data which is transferred onto questionnaires.

Indicator 9.3 of Principle 9 of the European Statistics Code of Practice on the non-excessive burden on respondent is that *“The information sought from businesses is, as far as possible, readily available from their accounts and electronic means are used where possible to facilitate its return.”*⁵

We therefore recommend that EL.STAT considers introducing a requirement on businesses to submit their annual or quarterly accounts data (for example: trial balance or financial statements) in a pre-determined standardised electronic format, set by the authority. This could be used to replace

⁵ see http://epp.eurostat.ec.europa.eu/cache/ITY_OFFPUB/KS-32-11-955/EN/KS-32-11-955-EN.PDF

information which is currently requested in different questionnaires, and the questionnaires would then focus only on the remainder of the information that cannot be derived from accounts data.

We understand that EL.STAT would need to undertake analysis of the extent to which the data satisfied the requirements of the relevant surveys both in terms of their quality and content, and there will be links to the accounting standards which apply (see report on Company Law and Annual Accounts). We also understand that considerable analysis of the issues has been undertaken within the ESS as part of the project on the use of administrative and accounting data for business statistics, and this should prove a useful tool for the detailed technical analysis which is important to preserve the commitment to quality in the European Statistics Code of Practice.⁶

At the same time, there is a move by NSIs to make better use of administrative data from public sector sources. The European Statistics Code of Practice makes clear in its third Principle that NSIs should have a mandate in law to collect information for statistical purposes and that administrations are among those who may be compelled by law to allow access to or deliver data at the request of statistical authorities.⁷

Within such a legal framework, EL.STAT would be able to require access to administrative data held elsewhere within the Greek public administration, and the principle of statistical confidentiality would continue to apply.

As with accounting data, EL.STAT would need to make an assessment of the quality of the data before it can be used for statistical purposes, but we estimate that the authority could require companies to submit significantly less data if it could make better use of administrative data, for example from the General Secretariat of Information Systems (GSIS) of the Ministry for Finance (TAXISNET), Customs Offices, the Ministry of Labour, Social Security and Welfare, IKA and OAED. We understand that there could also be benefit for other surveys in using information from the Ministry of Environment, Energy and Climate Change and from the Ministry of Agriculture and Rural Development.

Data available from other public administration sources could also be used to pre-fill some fields of EL.STAT questionnaires for review by the business (for example, company name, address, tax identification number, type of legal form, economic activity code) in order to reduce some of the required time to fill out questionnaires.

EL.STAT has already signed memoranda of co-operation with a number of different public bodies, and the Hellenic Statistical Program 2014-2016⁸ includes a series of further targeted actions aimed at maximising the use of administrative data sources to cover the needs of specific surveys. These initiatives demonstrate the efforts EL.STAT is already making to reduce administrative burdens, and the reductions will be achieved at the point when arrangements function and surveys are removed or reduced for businesses.

Description of current situation

Companies which have been included in a survey sample (for the case of IO40 and IO43) are required to extract data from their IT systems and proceed to manually fill out and submit questionnaires.

⁶ see <http://cros-portal.eu/projectdetail/1406> and <http://essnet.admindata.eu/>

⁷ see http://epp.eurostat.ec.europa.eu/cache/ITY_OFFPUB/KS-32-11-955/EN/KS-32-11-955-EN.PDF

⁸ see

http://www.statistics.gr/portal/page/portal/ESYE/BUCKET/General/A6_TRIETES_STATISTIKO_PROGRAMMA_2014_2016_EN.PDF

Especially for IO40 the majority of the information requested originates from accounting or financial statements data.

Companies which have been included in a survey sample (for the case of IO43 on job vacancies and labour costs) are required to extract data from their IT systems and manually fill out and submit questionnaires.

Questionnaires do not provide any kind of information to the applicant, even if this information is available within the administration through other sources.

Description of desired situation

Businesses included in the survey on the structure of business (IO40) and Job Vacancies and Labour Costs (IO43) will provide their accounting data (e.g. trial balance) from their/their accountant's IT systems in a pre-defined standard electronic format and will submit this to EL.STAT.

EL.STAT will be able to process this data further.

Businesses will only be required to fill out and submit questionnaires covering non-financial information.

Ministry of Labour and related sources will be used as administrative sources for the survey on job vacancies and labour costs. Business included in the survey on job vacancies and labour costs (IO43) will only be required to submit data which is not available from administrative sources.

The recipient checks and corrects any pre-filled information.

Legislation to be examined

In order for the recommendation to be implemented and the future EL.STAT surveys to be carried out accordingly, the following national legislation and resolutions should be examined and/or reviewed taking into account also the relevant legislation and resolutions at the EU level in this priority area. (This does not imply that an amendment must necessarily be made.)

National legislation and resolutions

EL.STAT resolution 3261/B2-261/29-03-2013, Approval of the Hellenic Statistical Program 2014-2016, Frame 4: Three-year programme for the training of EL.STAT staff

EL.STAT resolution 9843/B2-704/2011, Regulations on Statistical Obligations of the Agencies of the Hellenic Statistical System (ELSS), Article 4 (basic principles and obligations) par. 1, Article 7 (Quality of statistics) par. 1

Annual EL.STAT resolutions approving the conduct of relevant surveys (latest for IO43 EL.STAT resolution 3805/Γ5-582/12.04.2013, approving the conduct of survey on job vacancies and labour cost and employment indices in enterprises and for IO40 EL.STAT resolution 2103/Γ4-176/2013, approving the conduct of survey on wholesale – retail trading etc., EL.STAT resolution 3303/Γ3-196/2013, approving the conduct of survey on construction, EL.STAT resolution 3158/Γ3-176/2013, approving the conduct of survey on mining, etc.

Law 3832/2010, notably Article 2 par. 2 and 3 providing for the issue of the Special Regulation of Statistical Obligations and the sharing of information of public services and private entities, Article 8 'Secrecy of statistics'

Law 2392/96, Article 12 ‘Use of VAT and KEPYO records’

EU legislation and relevant code of practice

Regulation EC 295/2008 of the European Parliament and of the Council of 11 March 2008 concerning structural business statistics, Articles 2, 5, 6 par. 2.

Commission Regulation (EC) No 250/2009 of 11 March 2009 implementing Regulation (EC) No 295/2008 of the European Parliament and of the Council as regards the definitions of characteristics, the technical format for the transmission of data, the double reporting requirements for NACE Rev.1.1 and NACE Rev.2 and derogations to be granted for structural business statistics, Articles 1-4, Annex III.

Commission Regulation (EC) No 97/2009 of 2 February 2009 implementing Regulation (EC) No 295/2008 of the European Parliament and of the Council concerning structural business statistics, as regards the use of the flexible module, Articles 2, 3

Regulation EC No 530/1999 concerning structural statistics on earnings and on labour costs, Article 7 par. 1 and 3

Regulation (EC) No 450/2003 of the European Parliament and of the Council of 27 February 2003 concerning the labour cost index, Article 4-7

Regulation EC No 453/2008 on quarterly statistics on Community job vacancies, Article 4 par. 3, Article 5 par. 1

Council Regulation (EC) No 1165/98 of 19 May 1998 concerning short-term statistic, Articles 4, 8, 17 and annexes

Regulation (EC) No 223/2009 of the European Parliament and of the Council of 11 March 2009 on European statistics , Articles 5 par. 1, 12, 18 par. 3

European Statistics Code of Practice for the National and Community Statistical Services

Assessment of impact on administrative costs and burdens

This change would affect businesses which respond to EL.STAT surveys on business structure, and job vacancies and labour costs.

These businesses would:

- No longer be required to transpose financial information from their accounting records to a questionnaire
- Be able to extract information from their accounts in a standardised electronic format and submit this to EL.STAT. In many cases the extraction would be automated because it would relate to a standard format.
- No longer be required to submit information which could be obtained from administrative sources.

It is estimated that for IO40 such an exploitation of accounts data could significantly reduce the time spent on preparing the questionnaire, by 1 hour for SMEs and by 8 hours for non SMEs (due to the increased complexity of their business structure). A smaller reduction in time due to the accounts data is expected for IO43 of 10-20 minutes depending on the questionnaire.

Use of administrative data could reduce the time spent on preparing data and completing the questionnaires by 20% and 10% respectively (overall 10 – 30 minutes depending on the questionnaire type).

On this basis, the reductions in administrative burdens and costs for this recommendation have been calculated as a reduction of EUR 2 085 665 in administrative burdens and administrative costs. Note that this reduction applies only in respect of the obligations measured. If it is possible to use accounts and administrative data to replace the data requirements for other surveys, the benefits would be increased.

Total for this recommendation		
Measured relevant IOs:	Estimated future figures:	Reduction potential:
AB=EUR 5 313 466.63 AC=EUR 5 313 466.63	AB=EUR 3 227 801.92 AC=EUR 3 227 801.92	Reduction of EUR 2 085 665 AB EUR 2 085 665 AC

of which:

IO 40: Obligation to provide data in response to EL.STAT surveys on the structure of businesses		
Measurement results:	Estimated impact (future figures):	Potential reduction:
P (sum segments) = EUR 100.03 f= 1 Q= 48 933 BAU= 0% AB=EUR 4 894 899.05 AC=EUR 4 894 899.05	P = EUR 59.63 f= 1 Q= 48 933 BAU= 0% AB=EUR 2 917 722.96 AC=EUR 2 917 722.96	Reduction of 40% (of IO 40) Reduction of EUR 1 977 176.09 AB EUR 1 977 176.09 AC
IO 43: Obligation to provide data in response to the EL.STAT survey on job vacancies and labour costs		
Measurement results:	Estimated impact (future figures):	Potential reduction:
P (sum segments) = EUR 18.56 f= 2.2 Q= 10 212 BAU= 0% AB=EUR 418 567.58 AC=EUR 418 567.58	P = EUR 13.80 f= 2.2 Q= 10 212 BAU= 0% AB=EUR 310 078.96 AC=EUR 310 078.96	Reduction of 26% (of IO 43) Reduction of EUR 108 488.62 AB EUR 108 488.62 AC

3.3. Suggested sequencing and prioritisation

The sequencing and prioritisation of these recommendations should depend on both their relative impact and difficulty. The difficulty is best appreciated by the relevant Ministries of the administration, which also have competing priorities.

The Statistics priority area is the eleventh largest priority area covered by this project in terms of the size of its administrative burdens and it affects a relatively large number of businesses (including sole traders/freelancers) in the economy. In addition, the reduction of administrative burdens must take account of the need to uphold statistical principles. Therefore, in relative terms within the administrative burden reduction project, the implementation of recommendations in this area should be accorded medium priority.

These recommendations can also be applied more widely than just to the surveys measured. They should form part of the wider and ongoing work of EL.STAT to reduce burdens and the annual programme of the authority more widely.

Comparative analysis of the recommendations shows that:

- **Making greater use of business accounting data and administrative data** will have the highest impact in reducing administrative burdens in the areas measured. It requires preparatory work, including a suitable legal framework under which EL.STAT can require access to administrative data, detailed assessment of the quality of the available data and a judgment on whether it is suitable for statistical purposes, and also the conclusion of formal agreements with the relevant ministries and public organisations. For greater use of businesses' accounting data, the preparations include defining the format and content of a general financial statement in a way which is consistent with businesses' standard requirements and practice.
- **Allowing online submission based on electronic questionnaires** will have the second highest impact in reducing administrative burdens in the areas measured. It involves securing financing for the development of web applications, defining system requirements as well as building and testing, as well the design of electronic questionnaires. It should also form part of a strategy which is wider than just the obligations measured.
- **Reducing duplication between questionnaires and with administrative data** will have the third highest impact in reducing administrative burdens in the areas measured. It involves collaboration between different departments of EL.STAT to assess the feasibility of removing duplicate information while maintaining the integrity of the statistics, and also collaboration and negotiation between the authority and different public authorities to reduce the amount of data requested.

The implementation of the proposals must be driven by the requirement to produce good quality statistical information during any period of change, as well as the need to reduce burdens on business. The sequencing of measures must be decided by EL.STAT based on the work which has already been done on web portals, data quality and duplication. We understand that individual agreements on the use of administrative data depend on the existence of an appropriate legal framework.

Government and businesses should co-operate and act jointly in order to successfully reduce administrative burdens. The government should take the lead in abolishing and/or simplifying regulations or practices and involve and consult sector organisations and businesses throughout the implementation process.

3.4. Other issues

The following relevant issues were raised by stakeholders during the project. They are not administrative burden reduction recommendations within the scope of this priority area, but they are irritations to business which EL.STAT or the government could consider addressing:

- Businesses do not always understand why statistical questionnaires require a high level of detail which is not always supported by their internal record-keeping. For the survey on the production and sale of manufactured goods, businesses which perform other activities as well as manufacturing find it difficult to allocate specific parts of their costs to their manufacturing activities.
- Businesses are irritated if they are included in a sample every year, and some believe that EL.STAT's register of businesses may not be updated, especially about the existence of joint ventures.
- The timing of the survey for the structural business statistics in May coincides with the deadlines for the submission of VAT returns and financial statements, which businesses do not consider ideal.
- The difference between PRODCOM classification codes and other classification codes means businesses have to familiarise themselves with different coding.

4. Conclusion

This report identifies the priority area Statistics as the eleventh largest of the 13 priority areas covered by the project in terms of the total administrative costs and administrative burdens measured. On the basis of the fieldwork, the total administrative costs were measured at EUR 8.16 million and the total administrative burdens at the same amount, as there are no business as usual costs.

The general irritation of businesses with the provision of statistical information is perhaps out of proportion to the measured cost. This is in part explained by the fact that they consider they provide similar information to the statistics authority and also to other public authorities, that they provide statistical information regularly, and that they consider the statistical information is more detailed than they would use for business purposes.

Due to its size and the requirements of the ESS, the Statistics priority area offers limited opportunities for administrative burden reduction within the project. The burden reduction opportunities also involve significant analysis by the statistical authority, which is already committed both at a national and EU level to reducing unnecessary burdens on business.

This report makes three recommendations for administrative burden reduction measures on Statistics⁹:

Recommendation	Calculated reduction in administrative costs	Calculated reduction in administrative burdens
Expand portal for electronic submission of survey data using electronic questionnaires*	EUR 665 558	EUR 665 558
Reduce duplication and overlapping between questionnaires*	EUR 482 210	EUR 482 210
Use of accounting data and data from administrative sources*	EUR 2 085 665	EUR 2 085 665

The measured IO with the most reduction potential in this Priority Area is the gathering of information for the structural business statistics. The recommendations would result in businesses being required to submit less information directly to the statistical authority and being able to submit that information in a less costly way.

The involvement of businesses is key to achieving the burden reduction through implementation. The government should take the lead and also ensure that businesses and their representatives are consulted and engaged during implementation to assure that solutions are well-designed.

⁹ In line with standard practice, the reduction calculations have been made individually for each recommendation. It is therefore not possible to add together these calculated reductions to obtain an overall total reduction because different recommendations affect the same obligations. The overall reduction obtained depends on the sequencing of recommendations. The impact of the recommendations marked * would be reduced by the other recommendations being implemented, and the impact of recommendations which are not marked would be affected similarly by prior implementation of the recommendations marked *.

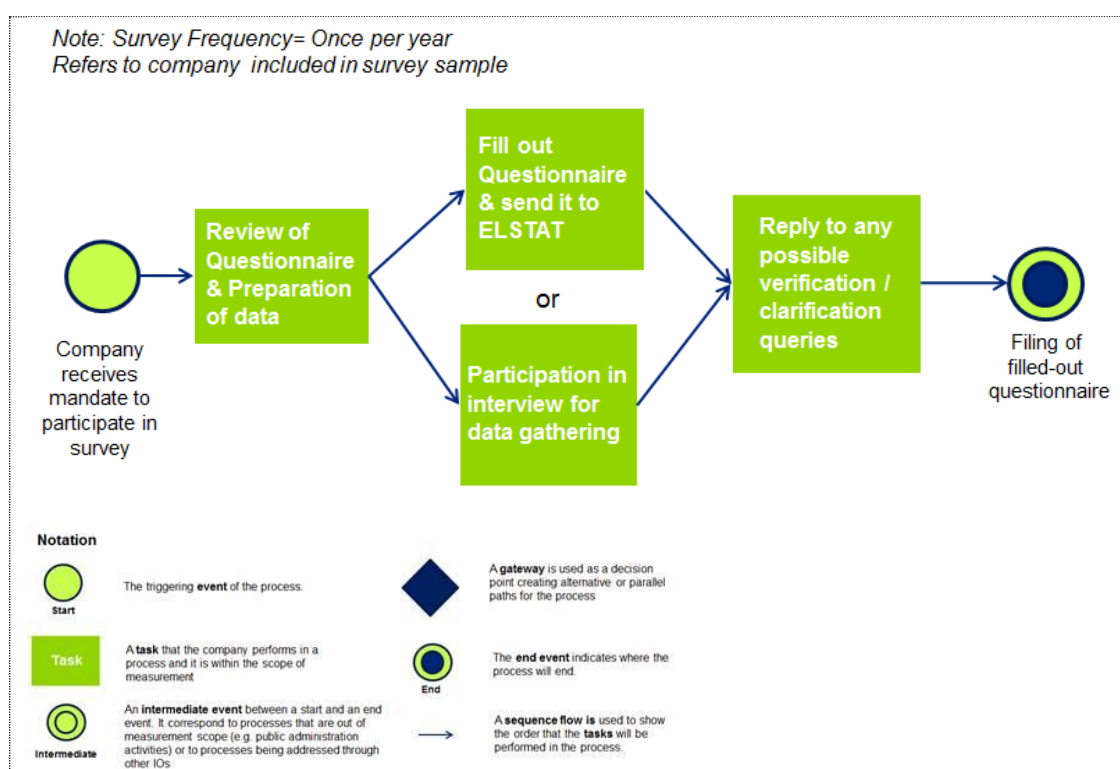
Annex 1: Analysis of information obligations and quantification of administrative costs

This Annex provides the measurement results of the study per IO within this Priority Area. For every IO the origins and process description are presented and the detailed measurement results are described and analysed.

1.1. Obligation to provide data in response to EL.STAT surveys on the structure of businesses – IO40

1.1.1. Origins and process of the information obligation (brief assessment of purposes of IO)

Figure 1.1 Process for complying with the requirement “Obligation to provide data in response to EL.STAT surveys on the structure of businesses”



The IO is based on Regulation EC 295/2008. This Regulation establishes a common framework for the collection, compilation, transmission and evaluation of Community statistics on the structure, activity, competitiveness and performance of businesses in the Community. The purpose of the compilation of statistics is, in particular, to analyse the structure and evolution of the activities of businesses, the factors of production used and other elements allowing business activity, competitiveness and performance. As an example data required includes the number of employed staff, turnover, wages and salaries, investments, etc. Furthermore, according to Law 3832/2010 as currently in force, the services and agencies of the public sector, as defined in Article 6, paragraph 1 of Law 1256/1982, are obliged to grant EL.STAT access to all administrative sources, public registers and files they keep, in printed, electronic or other form, and provide EL.STAT with primary statistical data and information. Legal entities under private law, associations of individuals and natural persons are obliged to grant the agencies of the Hellenic Statistical System access to all the sources, records or files kept in printed, electronic or other form and provide, in an accurate and timely manner, any data or primary information requested by these agencies for the performance of their duties.

Industry specific questionnaires have been set up by EL.STAT including the sectors of Wholesale and retail trade; repair of motor vehicles and motorcycles, Transportation and storage, Accommodation and food service activities, Information and communication, Real estate activities, Professional, scientific and technical activities, Administrative and support service activities, other service activities, Construction Activities, Mines – Quarries, Insurance Activities, Shipping Activities, Tourism Activities, etc.

The survey is conducted annually and companies included in the sample are required to participate. In order to reply to the questionnaire, companies must retrieve data relating to their production, revenue breakdown, employment and job costs, investments, procurement, energy consumption, other costs breakdown, assets analysis etc. Once data has been retrieved companies proceed with filling out the questionnaire, which is later submitted to EL.STAT. Should EL.STAT have any clarifications / verification queries, the company addresses these in collaboration with the Statistics Authority. Once the questionnaire has been submitted, the company may file it, although there is no such obligation.

1.1.2. Results from measurement and quantification

In order to perform a more accurate measurement due to time differences between the segments, a segmentation of interviewed companies was undertaken, dividing them into two categories, namely SMEs and non SMEs (based on the EU definition¹⁰).

Table 1.1 Composition of Administrative Cost and Administrative Burden (IO 40)

PA: STATISTICS	Price (P)				Nr of entities / occurrences (q)	frequency (f)	BAU (%)	Total AB (in EUR million)	Total AC (in EUR million)
	Time (in minutes)	Consulting costs (in EUR)	Out of pocket / Equipment Costs (in EUR)	P (in EUR)					
IO 40: Obligations to provide data in response to EL.STAT surveys on the structure of businesses									
Non-SMEs	1 035	0	0	428	3 271	1	0%	1.40	1.40
SMEs	185	0	0	77	45 662	1	0%	3.49	3.49

This analysis and measurement has been realised on the below segments:

- Large Companies (non-SMEs > EUR 40 million Revenue and >250 employees)
- Small and Medium sized companies (SMEs < EUR 40 million Revenue and <250 employees)

Standardised description of the activities related to the IO 40

The main employee type involved in the process is under the category “Professionals”, namely Accounting Department staff members of companies. As a norm, companies do not require any outsourcing or any other out of pocket expenses in order to fulfill this information obligation. The above mentioned figures of “q” relate to participants of the annual survey of 2012.

² The main factors determining whether a company is a SME, according to the EU definition, are number of employees (less than 250) and either turnover (less than EUR 50 million) or balance sheet total (less than EUR 43 million).

Interviewed companies unanimously stated a Business as Usual level of 0%, as although the information requested is available within the companies, all activities related to replying to the survey (data retrieval, preparation of data, review of data, filling out of questionnaire, submitting questionnaire, etc) are activities they would not proceed with, if there was no such obligation.

More specifically the standardized process to be followed in the event that a company is required to provide data in response to EL.STAT surveys on the structure of businesses is described below:

Review of Questionnaire

The Company receives mandate to participate in survey, receiving the relevant questionnaire related to the industry it operates in. Approximately 10 minutes are required in order to review the questionnaire and to understand its requirements of data in the case of Non-SMEs, while 15 minutes are required for the case of SMEs.

Preparation of Data

The Company, after having reviewed the questionnaire that has been sent from EL.STAT, proceeds to prepare data to fill out the questionnaire. In order to reply to the questionnaire, companies retrieve the required data from their relevant IT systems. Data relates to annual production, revenue breakdown, employment and job costs, investments, procurement, energy consumption, other costs breakdown, assets analysis etc. This task is usually performed by Accounting staff, in collaboration with other business units (e.g. Procurement, Human Resources, etc) where applicable. This task may require up to 900 minutes (1.9 days) for Non-SMEs and up to 2 hours for SMEs.

Completion of Questionnaire and Submission

The company fills out the Questionnaire and sends it to EL.STAT. This task is usually performed by Accounting staff, while a more senior role again within the Accounting organization of companies undertakes a brief review of data, before these are submitted to EL.STAT. The actual questionnaire completion may require up to 120 minutes (2 hours) for Non-SMEs and up to 45 minutes for SMEs. The submission of the filled out questionnaire does not require more than 5 minutes.

1.1.3. Analysis of measurement results

The measurement results show that if this IO is completely removed, both the administrative burden and the administrative cost for the Greek economy would be reduced by EUR 4 894 899.

The retrieval of data, is the most burdensome activity within the process, amounting to 86% (among Non-SMEs) and 65% (among SMEs) of total time spent within the process, as this task entails the retrieval of data from various IT systems and encompasses the collaboration of many divisions of the company (e.g. Accounting, Human Resources, Procurement, Production Units, etc). The completion of questionnaires is less burdensome, however this task is still somewhat burdensome mainly due to the fact that questionnaires are not always provided in electronic format.

Differentiating factors were noticed within this IO. As was mentioned earlier the survey of structure of businesses addresses a wide variety of business sectors, ranging indicatively from Wholesale and retail trade, Transportation, Accommodation and food service activities, Information and communication, Real estate, Professional Services, Construction, Mines – Quarries, Insurance Activities, Shipping, Tourism, etc.

Businesses interviewed within this particular IO included Non-SMEs and SMEs belonging to the sectors of construction, professional services, sales of motor vehicles, mining, and retail. EL.STAT has devised different questionnaires in order to address each business sector all of which have a varied level of complexity. This varied level of complexity became evident also during interviews with

companies. Especially the questionnaires of the mining and construction sectors seem to require the most effort, as these are more complex compared to the questionnaires addressed to the retail sector or professional services firms. Indicatively according to interviews, the questionnaire for the mining sector requires six times as much effort in comparison to the questionnaire of professional services, while the construction questionnaire requires seven times as much effort when compared to the professional services sector. Due to the diversified parameters of this IO, the standardised figures were devised through the average of the individual standardised costs per sector.

A major difference becomes evident when comparing the total required time to reply to the questionnaires between the two segments of Non-SMEs and SMEs (2.1 days vs. 3 hours). Although Non-SMEs can rely to a larger extent on their IT infrastructure for retrieving and preparing data in order to be able to reply to the surveys in comparison to SMEs, it is in fact the Non-SMEs that require the larger proportion of effort. Although the questionnaires and requirements for both segments are the same, the difference in time spent could be explained by the fact that Non-SMEs compared to SMEs are by definition more complex, have larger turnovers, may be active in the trade of a wider range of products or services, have larger organizational structures, etc. and this augmented level of complexity translates into the higher levels of effort required.

Main irritation points

The suggestions presented below represent the views of businesses collected through the interviews conducted. They do not take into account the views of the OECD, the Greek authorities or the consultants' assessment.

- Absence of electronic submission

Lack of electronic submission, which leads to longer time needed in order to comply with Information Obligation.

- Data diversification / detailing

Data requested in the questionnaire addresses a multitude of aspects of the company (i.e. data referring to production, sales, employment, investments, procurement, energy consumption, costs analysis, etc) and requires the effort of several experienced staff within the organisation to gather all needed information. Furthermore, responses to questionnaires require a processing / tabulation of data not supported in-house systems, therefore there is a need to work / process information outside the normal working environment (e.g. ERP). In any case, it is not always clear to companies why the Statistics Authority requests such high level of detail.

- Overlapping of different questionnaires

An irritation factor stems from the fact that some data required in the Structure of Businesses questionnaires is also required in other questionnaires / surveys (overlapping). On the other hand a significant part of the data required could be extracted by the Statistics Authority from the available / published annual accounts data of companies.

- Sampling of interviewees

Also, it has been reported that EL.STAT's register of companies may not be updated especially regarding joint ventures and at times requests information for non-existent joint ventures. Irritation was mentioned from companies which are always included in the survey sample and are burdened with this particular IO year after year.

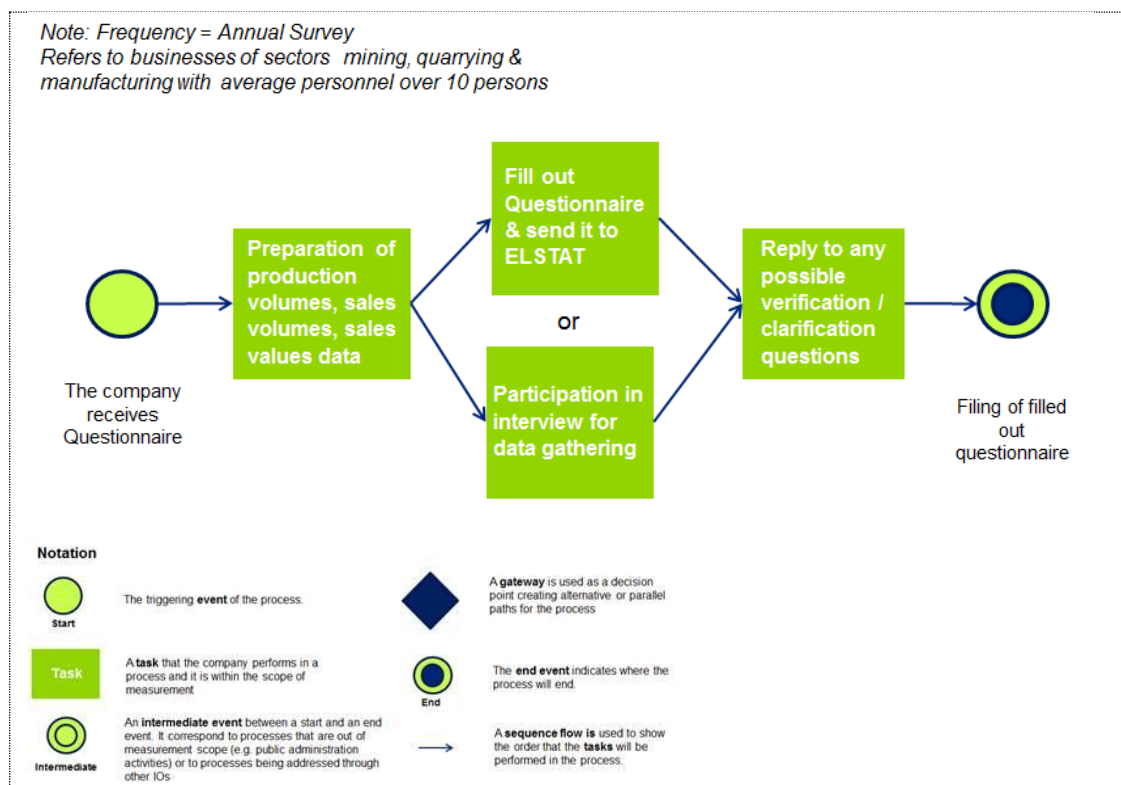
- Timing of the surveys

The period that the questionnaires are sent to businesses (usually during May) is not considered ideal as it coincides with deadlines for the submission of VAT statements, income statements etc.

1.2. Obligation to provide data in response to the EL.STAT survey on production and sales of manufactured goods – IO41

1.2.1. Origins and process of the information obligation (brief assessment of purposes of IO)

Figure 1.2 Process for complying with the requirement “Obligation to provide data in response to the EL.STAT survey on production and sales of manufactured goods”



This IO is based on the Council Regulation (EEC) No 3924/91 of 19 December 1991 on the establishment of a Community survey of industrial production. The Commission aims to have full, up to date and reliable information on industrial production in the Community. For Greece EL.STAT is assigned to carry out the Annual Statistical Research PRODCOM on Production and Sales Industrial Products. It is abbreviated from the French Production Communautaire. The purpose of this research is to collect statistics on industrial production. In particular the data collected relate to quantity of production, quantity of sales and sales value.

Although the EC Regulation states that survey must include all undertakings employing at least 20 people, the Greek threshold has been set on surveying enterprises with an average annual employment of at least 10 people. The process does not differ for companies with 10 or 20 people. EL.STAT conducts a survey once a year in businesses of the mining, quarrying and manufacturing sectors with average personnel over 10 persons. Companies over the threshold of 10 employees are therefore required to participate.¹¹

¹¹ Article 3(3) of Regulation 3924/91/EC requires the threshold of 20 persons to be reviewed in light of the requirement of representativeness, so as to ensure undertakings representing at least 90% of national production by NACE Rev. 1 class are covered. This is the context in which the threshold in Greece has been set at 10 persons.

In order to reply to the questionnaire, companies must retrieve data relating to their production and sales both in terms of volumes and values. Once data has been retrieved companies proceed with filling out the questionnaire, which entails providing data such as the PRODCOM code, description of the goods, measurement unit, volumes of produced goods (for the reporting year), volumes of goods sold (within the reporting year, no matter the year of production), values of goods sold. The questionnaire is then submitted to EL.STAT. Should EL.STAT have any clarifications / verification queries, the company addresses these in collaboration with the Statistics Authority. Once the questionnaire has been submitted, the company may file it, although there is no such obligation.

1.2.2. Results from measurement and quantification

Table 1.2 Composition of Administrative Cost and Administrative Burden (IO 41)

PA: STATISTICS	Price (P)				Nr of entities / occurrences (q)	frequency (f)	BAU (%)	Total AB (in EUR million)	Total AC (in EUR million)
	Time (in minutes)	Consulting costs (in EUR)	Out of pocket / Equipment Costs (in EUR)	P (in EUR)					
IO 41: Title of the IO									
Non-Segmented	490	0	0	203	3 987	1	0%	0.81	0.81

Standardised description of the activities related to the IO 41

The main employee type involved in the process is under the category “Professionals”, as the tasks are usually performed by Accounting Department staff members of companies. As a norm, companies do not require any outsourcing or any other out of pocket expenses in order to fulfill this information obligation. The above mentioned figure of “q” refers to survey participants for 2012.

Interviewed companies unanimously stated a Business as Usual level of 0%, as although the information requested is available within the companies, all activities related replying to the survey (data retrieval, preparation of data, review of data, filling out of questionnaire, submitting questionnaire, etc) are activities they would not proceed with, if there was no such obligation.

More specifically the standardized process to be followed when providing data in response to the EL.STAT survey on production and sales of manufactured goods is described below:

Review of Questionnaire

The Company receives mandate to participate in survey, receiving the relevant questionnaire. Approximately 5 minutes are required in order to review the questionnaire in order to understand its requirements of data.

Preparation of Data

The Company having reviewed the questionnaire that has been sent from EL.STAT proceeds to prepare the data to fill out the questionnaire. In order to reply to the questionnaire, companies retrieve the required data from their relevant IT systems. Data relates to annual production in volumes, annual sales in volumes and values. This task is usually performed by accounting staff, in collaboration with other Production business units. This task may require up to 400 minutes (6.6 hours).

Completion of Questionnaire and Submission

The company fills out the questionnaire and sends it to EL.STAT. This task is usually performed by accounting staff, while a more senior role again within the Accounting organization of companies undertakes a brief review of data, before these are submitted to EL.STAT. The actual questionnaire completion may require up to 85 min (1.4 hours).

1.2.3. Analysis of measurement results

The measurement results show that if this IO is completely removed, both the administrative burden and the administrative cost for the Greek economy would be reduced by EUR 808 152.

The retrieval of data is the most burdensome activity within the process, amounting to 81% of total time spent within the process, as this task may entail the retrieval of data from various IT systems (production systems as well as sales systems). The reporting of production and sales in volumes poses an especially burdensome activity for companies, more so when companies have in place a reporting system that reports in different units than those required from the survey. Companies need to edit the data in order to fulfill the requirements. The completion of questionnaires itself is less burdensome; however, it becomes irritating due to the fact that questionnaires are not provided in electronic format.

Main irritation points

The suggestions presented below represent the views of businesses collected through the interviews conducted. They do not take into account the views of the OECD, the Greek authorities or the consultants' assessment.

- Absence of electronic submission

Companies have to complete the questionnaire manually, while the time needed for reviewing data to be submitted increases significantly due to this factor.

- Overlapping of different questionnaires

Companies stated that the Prodcom questionnaire has significant overlaps with other surveys as it demands data that is similar to other questionnaires e.g. the Bulletin of Industrial Movement by the General Secretariat of Industry.

- Use of different classification codes

The PRODCOM classification codes differ from those of other surveys e.g. the 8-Digit nomenclature codes of INTRASTAT, forcing companies to spend time and effort to familiarise themselves with more than one classification coding.

- Data detailing

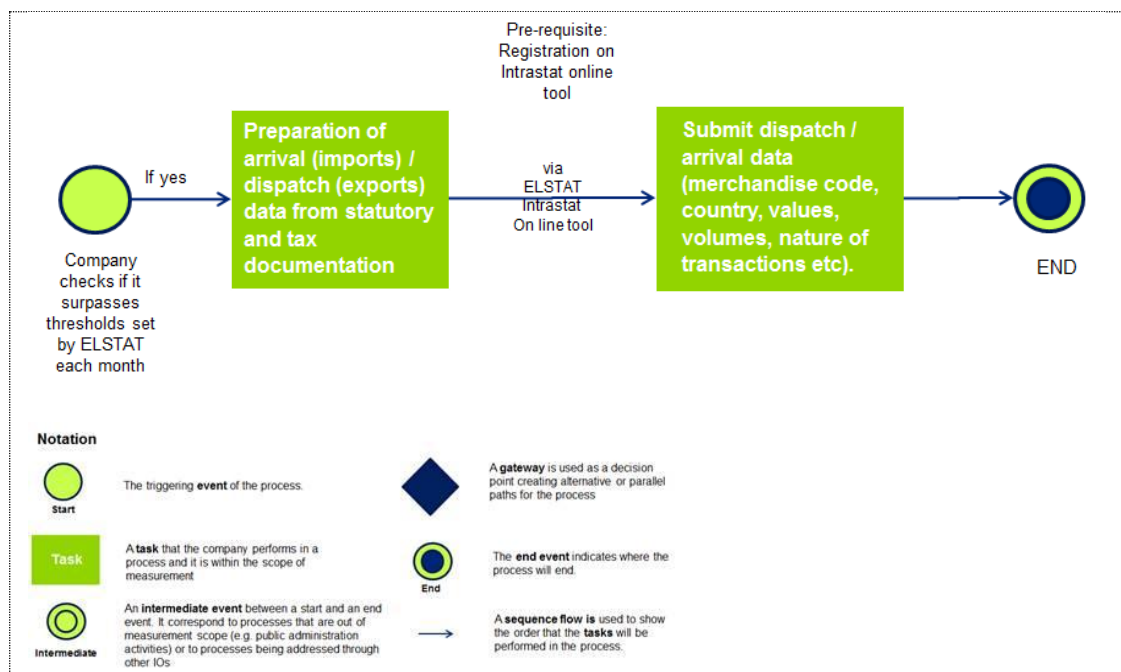
Level of detail of data requested is not included in annual accounts of companies therefore the effort required for compliance with the IO is considered a significant administrative burden

Companies that are active not only in the production of goods but also in other sectors e.g. wholesale and retail sectors, have significant difficulties in allocating costs to the production unit of their business and therefore consider data submitted within the survey rather subjective.

1.3. Obligation to provide data in response to the EL.STAT survey on trading of goods between Greece and other EU Member States (INTRASTAT) – IO42

1.3.1. Origins and process of the information obligation (brief assessment of purposes of IO)

Figure 1.3 Process for complying with the requirement “Obligation to provide data in response to the EL.STAT survey on trading of goods between Greece and other EU Member States (INTRASTAT)”



This IO is based on the Regulation (EC) No 638/2004 of the European Parliament and of the council of 31 March 2004. This Regulation establishes a common framework for the systematic production of Community statistics relating to the trading of goods between Member States, covering dispatches (exports) and arrivals (imports). Through the specific data collection system, referred to as the “INTRASTAT” system, EL.STAT is assigned to collect data from companies on a monthly basis. Each year EL.STAT announces thresholds which when surpassed, lead to the IO. For 2013 the thresholds were set at EUR 100 000 for Arrivals and EUR 90 000 for Dispatches. The EU regulation requires that thresholds below which parties are exempted from providing any Intrastat information are set at a level that ensures that the value of at least 97 % of the total dispatches and at least 95% of the total arrivals of the relevant Member State’s taxable persons is covered. According to EL.STAT the use of the online system covers about 70% of the total companies obliged to report Intrastat.

The Company has the obligation to provide data on a monthly basis, in response to the EL.STAT survey on trading of goods between Greece and other EU Member States (INTRASTAT), once it has surpassed thresholds set each year by EL.STAT.

Once companies have retrieved data on their dispatches (exports) and arrivals (imports), data is then corresponded to the relative INTRASTAT 8-digit nomenclature code. Data is submitted electronically via INTRASTAT’s online tool and includes the aforementioned nomenclature code, country code (either from where the goods were imported from or are exported to), “nature of the transaction”, mode of transport, net mass of the goods, invoiced amount, statistical value, etc. The submitted data or INTRASTAT statement as it is called receives a protocol number and may be printed out and filed, although there is no such obligation.

1.3.2. Results from measurement and quantification

Table 1.3 Composition of Administrative Cost and Administrative Burden (IO 42)

PA: STATISTICS	Price (P)				Nr of entities / occurrences (q)	frequency (f)	BAU (%)	Total AB (in EUR million)	Total AC (in EUR million)
	Time (in minutes)	Consulting costs (in EUR)	Out of pocket / Equipment Costs (in EUR)	P (in EUR)					
IO 42:Obligation to provide data in response to the EL.STAT survey on trading of goods between Greece and other EU Member States (INTRASTAT)									
Non Segmented	185	0	0	77	2 219	12	0%	2.04	2.04

Standardised description of the activities related to the IO 42

The main employee type involved in the process is under the category “Professionals”, as the tasks included in the IO are usually performed by Accounting Department staff members of companies. As a norm, companies do not require any outsourcing or any other out of pocket expenses in order to fulfill this information obligation. The above mentioned figure of “q” related to the number of monthly INTRASTAT statements received by EL.STAT in 2012, thus the frequency “f” of the IO is set at 12.

Interviewed companies unanimously stated a Business as Usual level of 0%, as although the information requested is available within the companies, all activities related replying to the survey (data retrieval, preparation of data, corresponding company data to the 8-digit nomenclature classes, uploading data to the INTRASTAT website, etc) are activities they would not proceed with, if there was no such obligation.

More specifically the standardized process to be followed in the event that a company is required to provide data on trading of goods between Greece and other EU Member States (INTRASTAT) is presented below:

Preparation of Data

The process is commenced if the Company has surpassed thresholds set by EL.STAT and therefore must report intra EU trading of goods.

The Company prepares the arrival (imports) / dispatch (exports) data from statutory and tax documentation. Data is then corresponded to the relative 8-digit nomenclature code. This task is requires 120 minutes (2 hours) for a normal efficient business and is performed by Accounting Department staff and is usually briefly reviewed by a more senior role within the Accounting organization of companies.

Submission of Data

Data is submitted electronically via INTRASTAT’s online tool and includes the aforementioned nomenclature code, country code (either from where the goods were imported from or are exported to), “nature of the transaction”, mode of transport, net mass of the goods, invoiced amount, statistical value, etc. Uploading the data requires 60 min for a normal efficient business and is performed by Accounting Department staff.

The submitted data or INTRASTAT statement as it is called receives a protocol number and may be printed out and filed, although there is no such obligation, allowing for another 5 minutes.

1.3.3. Analysis of measurement results

The measurement results show that if this IO is completely removed, both the administrative burden and the administrative cost for the Greek economy would be reduced by EUR 2 037 796.

The retrieval of data is the most burdensome activity within the process, amounting to 65% of total time spent within the process, as this task entails the retrieval of data from IT systems and the corresponding of the retrieved data to the 8-digit nomenclature codes of the INTRASTAT system.

Data is submitted electronically via data entry into the INTRASTAT website, however there exists also a more rapid way of uploading data to EL.STAT with a batch .txt file, which requires the creation of a customized report from companies' ERP systems and entails a consultancy cost for the initial customization and setting up of nomenclature codes. However, as the submission via a batch .txt file is not the norm, such costs have not been included in the standardized figures.

Main irritation points

The suggestions presented below represent the views of businesses collected through the interviews conducted. They do not take into account the views of the OECD, the Greek authorities or the consultants' assessment.

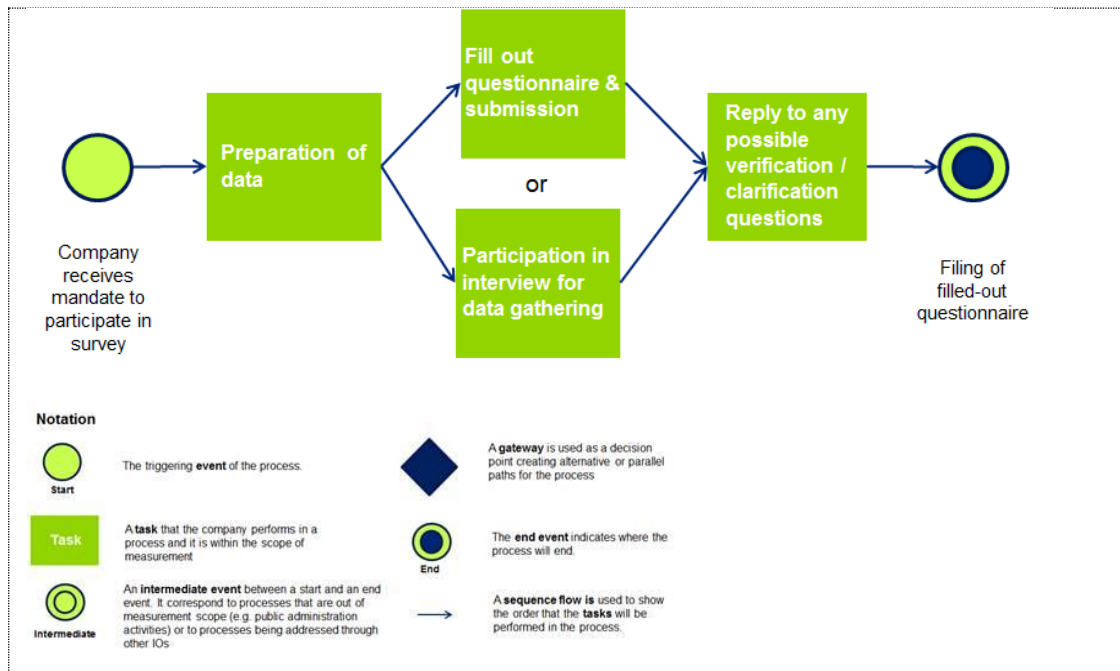
- Data detailing

The complexity of corresponding data to the very detailed 8-digit nomenclature codes was the most mentioned irritating factor by interviewees. This task is especially burdensome for companies with a large variety in goods traded.

1.4. Obligation to provide data in response to the EL.STAT survey on job vacancies and labour cost – IO43

1.4.1. Origins and process of the information obligation (brief assessment of purposes of IO)

Figure 1.4 Process for complying with the requirement “Obligation to provide data in response to the EL.STAT survey on job vacancies and labour cost”



This IO is based on Regulation (EC) No 450/2003 of the European Parliament and of the Council of 27 February 2003 and on Regulation (EC) No 453/2008 of the European Parliament and of the Council of 23 April 2008 on quarterly statistics on Community Job Vacancies, as well as Regulation EC No 530/1999 of 9 March 1999 concerning structural statistics on earnings and on labour costs.

The objective of the first Regulation is to establish a common framework for the production, transmission and evaluation of comparable labour cost indices in the Community. The objective of the second Regulation lays down the requirements for the regular quarterly production of statistics on Community job vacancies, while the third Regulation aims at concentrating structure and distribution of earnings within the EU at four yearly intervals.

EL.STAT is assigned to conduct a sampling survey on a three-month basis regarding job vacancies and labour cost of companies as well as the 4 year survey regarding labour costs. According to Law 3832/2010 as currently in force, the services and agencies of the public sector, as defined in Article 6, paragraph 1 of Law 1256/1982, are obliged to grant EL.STAT access to all administrative sources, public registers and files they keep, in printed, electronic or other form, and provide EL.STAT with primary statistical data and information. Legal entities under private law, associations of individuals and natural persons are obliged to grant the agencies of the Hellenic Statistical System access to all the sources, records or files kept in printed, electronic or other form and provide, in an accurate and timely manner, any data or primary information requested by these agencies for the performance of their duties.

Once a company receives a mandate to participate in the survey, if it has been selected in the survey sample¹², it proceeds to retrieve data regarding labour costs and job vacancies. Data to be gathered includes number of employees per employment type (full time vs. part time), total worked hours, total labour costs, costs for employer social security contributions, training costs, other costs incurred by the employer, number of job vacancies per specialisation, etc. Once data has been retrieved companies proceed with filling out the questionnaire, which is later submitted to EL.STAT. Should EL.STAT have any clarifications / verification queries, the company addresses these in collaboration with the Statistics Authority. Once the questionnaire has been submitted, the company may file it, although there is no such obligation..

1.4.2. Results from measurement and quantification

Table 1.4 Composition of Administrative Cost and Administrative Burden (IO 43)

PA: STATISTICS	Price (P)				Nr of entities / occurrences (q)	frequency (f)	BAU (%)	Total AB (in EUR million)	Total AC (in EUR million)
	Time (in minutes)	Consulting costs (in EUR)	Out of pocket / Equipment Costs (in EUR)	P (in EUR)					
IO 43a: Obligation to provide data in response to the EL.STAT survey on Job vacancies and labour costs (Type I Questionnaire)									
(Type I Questionnaire)	40	0	0	17	2 158	4	0	0.14	0.14
IO 43b: Obligation to provide data in response to the EL.STAT survey on Job vacancies (Type II Questionnaire)									
(Type II Questionnaire)	40	0	0	17	3 175	4	0	0.21	0.21
IO 43c: Obligation to provide data in response to the EL.STAT survey on Job vacancies and labour costs (4 Year Survey on Job Costs)									
(4-Year Job Cost Survey)	130	0	0	54	4 879	0.25	0	0.06	0.06

Standardised description of the activities related to the IO 43

The main employee type involved in the process is under the category “Professionals”, as the tasks included in the IO are usually performed by Accounting Department and Human Resources Department staff members of companies. As a norm, companies do not require any outsourcing or any other out of pocket expenses in order to fulfill this information obligation. The above mentioned figures of “q” refer to 2012 survey participants on a quarterly basis (for the surveys based on Questionnaire Type I and Type II) and on a 4-year interval (for the 4-Year Job Cost survey), thus a frequency of 4 and 0.25 is used respectively.

Interviewed companies unanimously stated a Business as Usual level of 0%, as although the information requested is available within the companies, all activities related to replying to the survey (data retrieval, preparation of data, review of data, filling out of questionnaire, submitting questionnaire, etc) are activities they would not proceed with, if there was no such obligation.

More specifically the standardized process to be followed in the event that a company is required to provide data in response to EL.STAT surveys on Job Costs and Job Vacancies is described below:

¹² The estimated non-responses are 25%, as indicated in the relevant legislation.

Review of Questionnaire

The Company receives a mandate from EL.STAT to participate in the survey, receiving the relevant questionnaire. Approximately 5 min are required by a normal efficient business in order to review the questionnaire in order to understand its requirements of data.

Preparation of Data

The Company, having reviewed the questionnaire that has been sent from EL.STAT proceeds to prepare data to fill out the questionnaire. In order to reply to the questionnaire, companies retrieve the required data from their relevant IT systems. Data to be gathered includes number of employees per employment type (full time vs. part time), total worked hours, total labour costs, costs for employer social security contributions, training costs, other costs incurred by the employer, number of job vacancies per specialisation, etc. This task is performed by Accounting staff in collaboration with Human Resources staff and requires approximately 15 minutes for Questionnaire Types I and II and 80 minutes (1.3 hours) for the 4-Year Survey on Job Costs.

Completion of Questionnaire and Submission

Once data has been retrieved companies proceed with filling out the questionnaire, which is later submitted to EL.STAT. This task is usually performed by Accounting staff in collaboration with Human Resources staff and requires another 15 minutes for Questionnaire Types I and II and 40 min for the 4-Year Survey on Job Costs.

The Company replies to any possible verification/ clarification queries that EL.STAT may have via telephone or email, a task that doesn't occur regularly and may take only a few minutes to perform (5 minutes).

1.4.3. Analysis of measurement results

The measurement results show that if this IO is completely removed, both the administrative burden and the administrative cost for the Greek economy would be reduced by EUR 418 568.

The retrieval of data is not so burdensome according to the standardized data for the quarterly surveys of Job Vacancies and Job Costs, as these were estimated at requiring a mere 15 minutes. On the other hand the more complex 4-Year survey on Job Costs was estimated to require 80 minutes for the retrieval of data. The completion of questionnaires is less burdensome, however irritating, mainly due to the fact that questionnaires are not always provided in electronic format.

Main irritation points

The suggestions presented below represent the views of businesses collected through the interviews conducted. They do not take into account the views of the OECD, the Greek authorities or the consultants' assessment.

- Absence of electronic submission

Lack of electronic submission, which leads to longer time needed in order to comply with IO.

- Overlapping of surveys

It has been reported that there are some overlapping with other surveys (e.g. Structure of Businesses).

- Data detailing

Data requested are perceived as too detailed by the companies.

Annex 2: Hourly rate per employee type

Employee Type	Hourly Rates (per employee type)
1: Legislators, senior officials and managers	EUR 34.62
2: Professionals	EUR 24.82
3: Technicians and associate professionals	EUR 19.06
4: Clerks	EUR 16.73
5: Service workers and shop and market sales workers	EUR 13.46
6: Craft and related trades workers	EUR 18.03
7: Plant and machine operators and assemblers	EUR 17.19
8: Manual workers (agricultural and fisheries)	EUR 13.21
9: Elementary occupations	EUR 12.92

To calculate the total AC and AB, employee types are used. For every employee type a standardised hourly wage rate is used. The hourly rates presented above are based on employer costs and include a 25% overhead. They are used to calculate the administrative cost and burden for the different IOs in scope of this measurement.