

UNITED NATIONS  
DEPARTMENT OF ECONOMIC AND SOCIAL AFFAIRS  
STATISTICS DIVISION

**Global Consultation on  
Draft International Recommendations for Distributive Trade  
Statistics 2008**

Comments received from Countries and International Organizations

**New York  
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## Part I: General comments

### General comments about the clarity with which the new recommendations were presented:

Country/ Organization	Comments
Armenia	National Statistical Service has no comment and recommendations on International Recommendations for Industrial Statistics 2008 and International Recommendations on Distributive Trade Statistics
Austria	<p>The work of the United Nations Statistical Commission concerning the revision of existing recommendations in the area of statistics is appreciated. The international recommendations provide all necessary information for the collection and compilation of statistics in these sectors and will be a useful source of information for producers and users of statistical information. In Austria, distributive trade statistics and industrial statistics is compiled according to the provisions of the European Statistical System. In general, European Regulations are the legal basis for producing these statistics in a harmonised way across Europe.</p> <p>Methodological manuals and recommendations as essential tools for assisting statisticians dealing with the statistical domains in question are produced by experts in Task Forces of Eurostat. These manuals, which are based on statistical domains not on economic sectors, have similar structures and contents as the proposal of the UN for an International Recommendation for Industrial and distributive trade statistics. In order to promote an integrated approach for compilation of statistics all available information from Eurostat should be taken into consideration for the production of international recommendations. These recommendations are discussed and accepted from MS of the European Union.</p> <p>Where appropriate, these various methodological manuals can be a useful source of information as harmonisation and international comparability of statistical information should be one of the most important aims of data producers and users of statistical information. In this way the international recommendations on distributive trade and industrial statistics will be a very helpful source of information.</p>
Canada	In general the recommendations are clear. International differences in terminology make some parts confusing, particularly the continuous use of the term turnover. The term should be redefined in each section.
Finland	The recommendations are well presented.
Greenlands	Thank you for the request; we appreciate the opportunity to be able to contribute to the work within the UN Statistics Division. This time, however, Statistics Greenlands chooses not to comment directly on this subject matter, since we only partly produce the statistics in question. In this case we wish to refer to the comments from Statistics Denmark with relevance to national accounts in general, since we are currently developing production-based national accounts for Greenland in close cooperation with Statistics Denmark.
Greece	The new recommendations for DTS, were presented more specifically than we expected including with clarity, all the basic principles, concepts and definitions for the measurement of economic activity.
Hungary	No comment.

<b>Country/ Organization</b>	<b>Comments</b>
Italy	Italy appreciates the revision carried out on the IRIS and IRDTS latest drafts
Japan	We do not have specific comments on both IRIS 2008 and IRDTS 2008 after consultation with the ministries concerned.
Kenya	These new recommendations have been presented in a fairly detailed and apparently well researched way. Since the old ones of 1974 are almost 40 yrs old, the revision of the same has come in at the right time. Precisely, good work has been done in all the chapters and sections of the draft report.
Lithuania	The main target of Lithuania, as an EU Member State, is to fulfil the demands and requirements of Eurostat and EU Regulations. At the same time, we take into account other international recommendations, where possible. The revised International Recommendations on Distributive Trade Statistics will be useful for producers and users of statistical information for international comparisons. The international recommendations provide all necessary information for the collection and compilation of distributive trade statistics, are well-structured and easy to understand.
Macao, China	The draft 2008 recommendations give better details, as well as new chapters to cater for the future socio-economic developments. We trust that the new recommendations may play an important role in the compilation of the Distributive Trade Statistics.
New Zealand	Generally, a clear and concise document that provides an excellent broad overview regarding compilation of distributive trade statistics.
Palestine	The main purpose of this document is to provide on the concepts, definitions, classifications, data sources, data compilation methods, the recommendations cover some specific topics. IRDTS is designed to provide the comprehensive methodological framework of distributive trade statistics as well as policy guidance.
Philippines	We commend the UN Statistics Division for its continuous efforts in providing venues for discussion of diverse issues towards statistical development at the global level, specifically on Distributive trade statistics
Poland	IRDTS is very useful document which allows to understand all definitions by all users and reduce any methodological differences, which can occur during the process of preparation, calculation or dissemination data concerning distributive trade.
Russian Federation	It is very important that the document will include the internationally agreed recommendations on a wide range of issues related to access to information on trade statistics
Singapore	The latest draft of IRDTS 2008 is comprehensive and well drafted with clarity.
Slovenia	In general we find IRDTS 2008 very useful. It gives a good overview on distributive trade statistics. The IRDTS 2008 will be in our great help, when we would revise our annual statistical survey on distributive trade. Comments on document are made from point of view of Service Statistics Department, where the short-term statistics on distributive trade is covered. We also carry out one annual statistical survey on distributive trade, but the results are particularly intended for use in National Accounts Statistics.
Sweden	As a member of the EU, Sweden supports the opinion of the EU on the International Recommendations on Industrial Statistics 2008 and International Recommendations on Distributive Trade Statistics 2008. Sweden has no further comments at this time.
Switzerland	Switzerland approves the initiative taken to get to a DTS international harmonization. The content of the document (classifications, statistical units, definitions, indicators, sources, survey methods) is clear and will be very useful to the introduction of a DTS on National level. The special attention given to the

Country/ Organization	Comments
	specific economic system and behavior of each country is very important and must be promoted and maintained in particular for the National Accounts System. Comments for the conjuncture statistics
Trinidad and Tobago	The document is well written. I was most impressed with the background that preceded each chapter. They were clear, very factual and rooted in reality.
UK	Strongly support that IRDTS: i) harmonised with existing international guidelines. ii) states not prescriptive and should be implemented by NSIs in a way appropriate to own circumstances.
IMF	I thank you for providing us with the draft "International Recommendations for Industrial Statistics 2008" (IRIS 2008) and "International Recommendations for Distributive Trade Statistics 2008" (IRDTS 2008). I would like to congratulate you and your staff for producing these two manuals. While the IMF has not been directly involved in the work leading to these two documents, I welcome that the concepts and methods they promote are in conformity with those in the draft <i>System of National Accounts, 1993, Rev. 1</i> and draft sixth edition of the <i>Balance of Payments and International Investment Position Manual (BPM6)</i> . I also welcome the reference to the IMF Data Quality Assessment Framework (DQAF) in Chapter VIII on Data Quality and Metadata and the recommendations to prepare metadata according to dimensions that closely align with those of the DQAF.
OECD	The revised draft reflects almost all the comments that we have previously provided in writings (November 2006, and May and August 2007) and participating in an expert group meeting in July 2007. More specifically, it accommodates our comments on links to other relevant international standards, coverage of indicators, globalisation issues, recognition of short-term issues, seasonal adjustment, and metadata. This version makes a clearer distinction between structural and short-term indicator issues by treating the latter collectively in a separate section.  Thus, we feel that the revised IRDTS is well focused and balanced. We expect that more detailed and practical issues will be dealt in the planned <i>Distributive Trade Statistics: Compilers Manual</i> and <i>Indices of Distributive Trade: A Handbook of Good Practices</i> and other technical reports.

## Part II: Comments on specific draft chapters or passages

### Introduction

In the *International Recommendations for Industrial Statistics (IRIS 2008)* and the *International Recommendations for Distributive Trade Statistics (IRDTS 2008)* the application of the term "international recommendations" is used in a narrow sense (*IRIS 2008*, Introduction, paragraph 3) and in a broad sense (*IRDTS 2008*, Introduction, paragraph 3), respectively. More specifically, in the latter case, the term international recommendations is used to refer to guidance provided, wherever applicable, including on performance indicators, data sources and data compilation methods, data collection strategy, data quality and metadata and dissemination policies.

Please indicate whether you support a narrow or broad interpretation of the application of the term "international recommendations" for *IRIS 2008* and *IRDTS 2008*.

Country/ Organisation	Interpretation supported		Comments
	Broad	Narrow	
Canada	X		We support the broader interpretation covering the methodology and practices. International standards and best practices in these areas are mutually beneficial.
Finland	X		Common and broad recommendations are required to improve the comparability of international statistics. We support broad interpretation because of international coherence of statistics, as long as there is no contradiction between requests of Eurostat and IRDTS 2008. On the Finnish perspective our main target is to fulfil the demands and requests of Eurostat and fulfil the EU Regulation.
France	X		If each manual is restricted to "concepts and definitions" only, it is then necessary to create another manual, with another EG, titled "compilers' manual", and it seems more efficient to examine a unique and consistent manual.
Greece	X		We support the application of IRDTS to be based on broad interpretation
Hungary	X		A broader interpretation of the recommendation may provide more comparable data on international level.
Kenya	X		Broad interpretation will bring about uniformity of terms and concepts, thereby enabling comparability of datasets between countries
Lithuania	X		We support the broad interpretation as it has a character of recommendations. Additional parts of international recommendations will ensure wider understanding of the matter and harmonization of the data collection process. It is useful for statistical makers, particularly in the countries, where the statistical

Country/ Organisation	Interpretation supported		Comments
	Broad	Narrow	
			system is not very well-developed yet
Macao, China		X	The majority of the establishments (over 90%) in this sector are SMEs engaging with less than 5 persons; therefore, we support a narrow interpretation of the application of the term "international recommendations" at present; we suggest to keep the broad interpretation as an optional extension to the developing economies.
New Zealand	X		Statistics NZ sees no reason not to accept the broad sense in principle, with the provision that they are seen as recommendations to be worked towards and not necessarily a prescriptive set of instructions to be followed
Palestine	X		IRDTS in abroad sense be comprehensive in terms of structure and content, and expected to become reference document of the statistical agencies
Philippines	X		Statistical development and statistical best practices should cover areas beyond those covered in the narrow definition
Poland	X		Broad interpretation gives not only ability to coherent set of internationally agreed principles, concepts and definitions of data items to be collected and published for the measurement of economic activity as described in Chapters 1-4 but also apply the term international recommendations to the remaining chapters in IRIS 2008 Chapters 5-9 and in IRDTS 2008 Chapters 5-9.
Russian Federation	X		International recommendations should cover a broad range of issues, including the internationally agreed basic definitions and concepts of trade statistics, a description of methods of data collection and quality control, and the ways of data production and dissemination.
Singapore		X	Nil
Slovenia	X		
Trinidad and Tobago	X		I believe there should be uniformity of application of the terms to the 2 Reports. A broad cross section of participants met twice to discuss and refine these recommendations-recommendations which we feel are all embracing and could be applied to some degree to any country regardless of its state of development. They should therefore be considered international in the broadest sense of the word.
UK	---	---	Would it be sensible for the term 'international recommendations' in the introduction to be drafted in a way to be consistent with the content of the chapters within IRDTS/IRIS i.e. where IRDTS/IRIS refer to international recommendations in the chapters then the introduction can refer that such recommendations have been used in the drafting of the chapter. E.g. IRDTS does not refer to any international guidelines in the chapter on Performance Indicators. International guidelines are though referred to in data sources and data compilation methods, short term distributive trade statistics, data quality and metadata and dissemination.
Eurostat		X	I think a more narrow interpretation would be the more suitable. However, I do not fully agree with the text included under (1) in the text above. The manual contains recommendations and therefore I do not think one can say that it is an agreed framework and an agreed set of principles, definitions, etc. In many instances the manual agrees that there is a recommended way of doing things and then indicates that, in practice, the countries could be constrained to do it differently. I especially want to stress this as some of the principles

Country/ Organisation	Interpretation supported		Comments
	Broad	Narrow	
			<p>that are regulated on a European Union level are not fully in line with the recommendations in the manual (e.g; and not in the least the fact that structural business statistics are predominantly enterprise statistics). European Union Member States will therefore not be able to provide the data as described in this manual.</p> <p>The structural business statistics as regulated at the European Union level are in fact perhaps closer to company accounting concepts than to national accounts concepts. NSI will have to collect additional information to allow compiling the national accounts and they often do that using the structural survey. The more integrated approach as recommended in the manual has its advantages, but it clear that we will not move to this approach in the European Union in the near future</p>

**The reasons for revision in the IRDIS are mentioned in para. 6 wherein references have been made to the new developments in distributive trade sector, implementation of the integrated approach to compilation of basic economic statistics, changes in concepts, definitions and terminology in other major international recommendations, etc. Are these references exhaustive or should additional issues be taken into account?**

Country/ Organization	Comments
Australia	yes
Canada	Other issues affecting wholesale trade in particular are buying groups and boundary issues between wholesale trade, manufacturing sales offices, head offices and logistics industries. With globalization it is increasingly difficult to distinguish between wholesaling and manufacturing.
Finland	The list seems to be quite extensive.
France	They seem exhaustive. E-commerce could be mentioned there (it is developed below).
Greece	Yes, all the above references are exhaustive.
Hungary	The reasons for the revision of IRDTS are quite comprehensive and exhaustive. We don't have any other issues to add.
Kenya	These references are not exhaustive. The emerging global trading policies directly affect the distributive trade and by extension have got a bearing on the implementation of the MDG's (particularly poverty alleviation). The current revision should be geared towards provision of internationally comparable indicators to monitor and evaluate both the positive and negative impacts of the global trading policies. These indicators could serve as early warning systems against for instance some of the WTO policies that impact-vely on the developing economies. The indicators could also provide a basis to advocate for the well-intentioned policies like the AGOA plan, debt cancelation etc. The impact of international trading blocks on the pattern of global trade in general could also be monitored through use of such comparable distributive trade statistics



<b>Country/ Organization</b>	<b>Comments</b>
Lithuania	The references are exhaustive and sufficient.
Macao, China	We consider the references are adequate.
Palestine	We think these references are exhaustive
Philippines	The reasons stated in paragraph are sufficient
Poland	In our opinion the reasons mentioned in para. 6 are the most important for revision in the IRDTS
Russian Federation	Yes, they are exhaustive
Singapore	We have no further comments on this para.
Slovenia	In our opinion these references are exhaustive enough.
Trinidad and Tobago	Perhaps we can consider the following documents: Manual on Statistics of International Trade in Services 5 <sup>th</sup> Edition of the IMF Balance of Payments manual
UK	IRDTS was last updated in 1974. I think it is widely recognised that the world have moved on significantly since then in terms of not only in how the distribution sector operates but also in the recommended measurement approach. I think the current draft of IRDTS para 6 within 'Introduction' sufficiently conveys the rationale for the revision.
Eurostat	Please note that the EU Regulation on business registers will soon be amended. Instead of the reference to the Regulation of Eurostat on the design and implementation of business surveys it is better to refer to the Regulation concerning structural business statistics. A new version of this regulation will be soon adopted as well. There exists a handbook on the design and implementation of business surveys.

## Chapter I: Scope of distributive trade statistics

**In general, distributive trade statistics are statistics reflecting characteristics and activities of the units belonging to distributive trade sector of an economy. Therefore, the scope of distributive trade statistics is defined as consisting of all resident entities recognized as statistical units and classifiable in Section G of ISIC, Rev.4 – Wholesale and retail trade; repair of motor vehicles and motorcycles, irrespective of their size, form of economic and legal organization and ownership. Do you agree with this definition of the scope of distributive trade statistics?**

Country/ Organization	Comments
Australia	Agree
Canada	Under the North American Industry Classification System (NAICS 2007), automotive repair is not included in distributive trades; it is included in services industries (NAICS 8111). Depending on the size of the industries making up the differences between ISIC and NAICS, it may not be practical or possible to create a pure estimate following the proposed boundary.
Finland	Yes
France	Yes. You mention in paragraph 1.17 a correspondence table between CPC, Ver.2 and ISIC, Rev.4. It would be easier to suggest European classification CPA 2008!
Greece	Generally we agree with this definition of the scope of DTS.
Hungary	As ISIC Rev. 4 was developed by UN for classification and definition of economic activities, it is evident to use it to define the scope of distributive trade statistics in IRDTS. This approach is particularly convenient for us as we use the Hungarian version of NACE Rev. 2 which uses practically the same definitions as ISIC Rev. 4.
Kenya	I agree with the scope but suggest that distributive trade be extended to cover both resident and non-resident entities.
Lithuania	The distributive trade statistics structured in line with ISIC Rev. 4 section G (Wholesale and retail trade; repair of motor vehicles and motorcycles) is acceptable. It is fully compatible with NACE Rev. 2.
Macao, China	Yes
New Zealand	Yes. It is consistent with ISIC and ANZSIC2006.
Palestine	Yes we agree, because the distributive trade is defined as the scope of section G, Wholesale and Retail trade, Repair of motor vehicles & motor cycle, the residency of economic entities should be determined in accordance with rules. Distributive trade activities carried out by entities not classified in section G ISIC, Rev4, are not covered by DTS.
Philippines	Yes, we agree with the proposed definition of the scope of distributive trade
Poland	We agree with a.m. definition of the scope of distributive trade statistics.
Russian Federation	In general, yes.
Singapore	Yes, we agree that the scope of distributive trade shall be consistent with Section G of ISIC, Rev.4. .
Slovenia	In general we agree with definition on distributive trade. In addition, there are several enterprises in Slovenia whose principal activity is not one of activities classifiable in Section G of ISIC, Rev 4, but which carry out significant secondary activities. Due to this fact our results for distributive trade

<b>Country/ Organization</b>	<b>Comments</b>
	are adjusted by having added the corresponding part of distributive trade results of these enterprises.
Trinidad and Tobago	Yes
UK	<p>1. I do agree with the defined scope above. One of the strengths of IRDTS is that it is built, where possible, on existing international recommendations. I think it would be difficult to defend moving away from such guidance on isolated issues.</p> <p>2. para 1.4: would the description of 'distributive trade as an activity' be improved with a more explicit reference to wholesaling and the motor trades. The current description appears to be retail and repair dominated.</p>
Eurostat	No comments

## Chapter II: Statistical and reporting units

**A separate chapter on statistical and reporting units has been added to reflect the different statistical units in the collection of distributive trade statistics. The chapter has been extended with sections for statistical units of informal sector and mapping of selected entities specific to distributive trade. Do you consider this chapter useful and the coverage of the chapter adequate?**

Country/ Organization	Comments
Australia	Chapter is useful and the coverage adequate.
Canada	Yes
Finland	Yes, it's good to have one chapter pertaining to statistical and reporting units.
France	Yes
Greece	This chapter is very useful with adequate coverage.
Hungary	The chapter on statistical and reporting units gives a comprehensive view on units can be used in the compilation of distributive trade statistics as well as other economic statistics. What we miss is the definition of conventional distributive trade specific units - that are often referred in IRDTS and ISIC, and also used in everyday life - i.e. stores and shops and their correspondence to the described statistical a reporting unit system. (we have a retail shop/store register and use retail shops/stores as statistical units, although the reporting units are their operating enterprises.) We would also like to see the internationally accepted definitions of other distributive trade specific units, like supermarkets, hypermarkets, shopping centres, factory outlets as there is increasing interest shown in the statistics on them.
Kenya	The chapter is definitely very useful and the coverage is fairly adequate
Lithuania	Yes, we do.
Macao, China	Yes
New Zealand	Useful when considering compilation of distributive trade statistics.
Palestine	Yes, because in the context of these recommendations statistical units are primary interest as they are the basis of statistical aggregates and to which all data items refer. Collecting and reporting units are especially relevant in the sampling & data collection stage.
Philippines	Yes, we consider the chapter useful and adequate
Poland	We consider that this chapter is useful and the coverage of it adequate.
Russian Federation	This chapter is useful and the coverage is adequate, besides, it contains data on trading networks, relevant for the Russian statistics
Singapore	Yes. We find that the Diagram 1 "Relationship between different types of statistical units" on page 16 of the reference document "Statistical Units" to be very useful. We suggest to include the diagram in Chapter II "Statistical and Reporting Units" in the IRDTS.
Slovenia	Yes
Trinidad and Tobago	Yes.Please note an error in para 2.8 line 5 ---the text should read cannot be obtained
UK	Overall I found the current draft of this chapter satisfactory. It might, though, be useful to hear the views of those countries where the informal sector is more significant. Such countries may be in a better position to comment on the practical

<b>Country/ Organization</b>	<b>Comments</b>
	challenges of the measurement of this sector and whether IRDTS provides adequate advice to meet such challenges.
Eurostat	We are also working on a manual for structural business statistics and we will also include a heading on the statistical units. It is important that the differences are made clear.  The mapping of selected entities is useful.

### **Do you consider the new sections provide useful guidance?**

<b>Country/ Organization</b>	<b>Comments</b>
Australia	No comment
Canada	The sections provide useful guidance but collection of these data may not be feasible for some jurisdictions.
Finland	Generally, yes. The sections are interesting, but section E is not so relevant in Finland. The text does not seem to take into account the increasing usage of administrative data. Recommendations cover only the case of directly collected data.
France	For you, enterprises and kinds of activity units are only a second best, you support establishments. I disagree but you are consistent with the SNA 1993.
Greece	Yes, the two new sections provide useful guidance concerning the statistical units and mapping of selected entities to distributive trade.
Hungary	Yes
Kenya	Yes. The work done will give very useful guidance
Lithuania	Yes, we do very much.
Macao, China	Yes
New Zealand	Yes
Palestine	Yes
Philippines	Yes, it will be useful guidance since our country has a lot of informal activities particularly in the trade sector
Poland	In our opinion the new sections provide useful guidance.
Russian Federation	New sections provide all useful guidelines
Singapore	Yes
Slovenia	Yes
Trinidad and Tobago	The information on the informal sector is relevant and very useful since that's where most of the distributive activities take place in some countries. The mapping of selected entities specific to the distributive trade is also important given the evolution that has taken place in this industry
UK	See response in 3(i).
Eurostat	At European level we do not distinguish the informal sector in structural business statistics.

**The reference document Statistical Units has been prepared by UNSD with the objective of providing a complete account of possible statistical units, their definitions in theoretical terms and in actual statistical applications. Do you consider this document is useful?**

<b>Country/ Organization</b>	<b>Comments</b>
Australia	The ABS considers that this document would be useful for nations that are currently in a developmental stage. The ABS does not consider this document to be useful from an Australian perspective. ABS has a number of home-grown reference documents that perform this function.
Canada	Yes. It is probably particularly useful for analysts who wish to make international comparisons of data and/or statistical systems.
Finland	Yes, document is useful, but there should be the final address to website on document, not only mention that document is available at UNSD website.
France	Yes
Greece	Yes, this document is very useful.
Hungary	Yes
Kenya	Yes
Lithuania	Yes, we do indeed. We support the recommendation that large enterprises engaged in many economic activities, which belong to different industries, should be broken down into several establishments.
Macao, China	Yes
New Zealand	Yes
Palestine	It's useful, because the statistical units is an entity about which information is sought and for which statistics are ultimately compiled, and there is Informal sectors, and Formal sectors.
Philippines	Yes, the document Statistical Units is very useful as it provides additional guidance in identifying the scope of distributive trade. Not only will this help in the implementation of IRDTS, it will also facilitate data collection
Poland	We consider that this document is useful.
Russian Federation	Yes, this document is very useful
Singapore	The document of "Statistical Units" provides standard definition of statistical units. We find the document to be well drafted and comprehensive. We feel that it will serve as useful reference compendium for IRDTS.
Slovenia	We consider document Statistical Units very useful, since it includes definitions for all types of statistical units in one document. Very helpful is review of examples for each type of statistical unit and of relationships between different types of statistical units.
Trinidad and Tobago	Yes it is since it provides guidelines while at the same time capturing the various types in existence throughout the world.
UK	This section within IRDTS is well structured, pragmatic and provides sound and sensible advice.
Eurostat	It is a useful document. As you know, there is a Regulation (696/93) at EU level that defines all statistical units.
OECD	<p>We feel that this draft is a fair summary of most main issues. It would need some linguistic tidying up and spell checks here and there.</p> <p>1) The whole dimension of economic units as opposed to administrative and statistical units might deserve a more detailed treatment to reflect the increased need to collect data from internationally acting economic producers of goods and</p>

<b>Country/ Organization</b>	<b>Comments</b>
	<p>services. A fair treatment of this – admittedly difficult to measure – issue would deserve an additional chapter. International work progresses in this domain ( see, for instance, the work of the International Roundtable on Business Survey Frames, now called Wiesbaden Group on Business Registers) and relevant conclusions might be integrated in SU.</p> <p>2) The importance of a consistent and “combineable” system of business registers is left out in the text. This is, however, one of the hottest issues in current statistical research since it would allow a highly cost-efficient (no extra survey) and effective (combination of existing data sources) statistical system design upstream of the statistical processing, allowing downstream consistent multi-sources output. We think that this whole dimension should be included and further elaborated. It also responds well to today’s and tomorrow’s needs in terms of effective statistical resources management.</p> <p>3) A corollary of the above is also the need to take a wider perspective beyond business statistics stricto sensu, by adding the trade dimension to the business dimension (see remark para 2.7).</p>

### Chapter III: Characteristics of statistical units

**Due to their importance for the unique identification and classification of statistical units, similarly to the previous recommendations, the characteristics of statistical units presented in the IRDTS have been organized into a separate chapter. Do you consider this chapter useful and the coverage of the chapter adequate?**

Country/ Organization	Comments
Australia	The chapter is useful and the coverage adequate. However ABS uses a 0-4, 5-19, 20-99, 100-199, and 200+ breakdown for the employment size variable.
Canada	Yes, this is good general information.
Finland	Yes
France	Yes
Greece	This chapter, as a separate one, is very useful and necessary for the classification of statistical units.
Hungary	Yes
Kenya	Very useful and coverage fairly adequate
Lithuania	Yes, the chapter is very useful. The coverage of the chapter is wider, more statistical units are described and definitions given. Statistical units are described as we understand them currently. They measure up EU requirements. We support the recommendation that countries should change the classification of units for the purpose of statistical inquiries not more than once a year..
Macao, China	Yes
New Zealand	Yes
Palestine	Yes, because in this chapter we found the characteristics of statistical unit and know it's availability of information on characteristics of the statistical units is a precondition for an effective organization of the statistical sample survey.
Philippines	Yes
Poland	This subject is very important for issues concerning distributive trade statistics so it was the good idea to create the new chapter especially for this information.
Russian federation	This chapter is useful and the coverage is adequate
Singapore	Yes
Slovenia	Yes, we consider the chapter useful, especially the paragraphs that cover e-commerce. We also think that to e-commerce should be given more attention in our distributive trade statistics.
Trinidad and Tobago	Useful and Adequate
UK	1. I found the chapter comprehensive and the example of the top-down classification method will, I sure, prove very useful to users.  2. para 3.46 cross classification by type of legal organisation and type of ownership. The recommended split is challenging e.g. the would not be able to provide a split by Co-operatives and limited liability partnerships. This recommendation is also contradicted slightly by the welcomed recommendation in para 3.40 that states the minimum classification of units by type of legal organisation is incorporate and unincorporated units and that a further breakdown 'may also be of interest'.
Eurostat	The characteristics described are at the EU level more included in the business



<b>Country/ Organization</b>	<b>Comments</b>
	register Regulation/manual. It is clear that the business register is the starting point for the compilation of business statistics. At EU level we will keep the manual for Structural business statistics and the business register more separate. My colleague of the business register Section will possibly get back to you with remarks on the statistical units and business register after the Xmas holidays.

## Chapter IV: Data items and their definitions

The data items and their definitions have basically been maintained from the previous recommendations. However, data items have been added and definitions revised to reflect the update of the *1993 System of National Accounts*.

The turnover (sales) has been presented with more sub-items in order to reflect the relationships between different establishments of an enterprise and some other major revenue items. Do you agree with this extension?

Country/ Organization	Comments
Australia	Agree
Canada	Most of the sub-items seem reasonable with the exception of sales from concessions. In Canada we generally exclude concessions with the exception of department stores who provide both sales with and without concessions.
Finland	The concept of turnover should be universal, simple and as comparable as possible between countries. Extension can increase incoherence in measuring turnover between countries.
Greece	Yes, we agree.
Hungary	Yes
Kenya	Yes
Lithuania	We are not in favour of such detailed revenue items as it increases the burden on business.
Macao, China	Yes
New Zealand	Yes. Particularly useful is the link to the updated SNA.
Palestine	Yes, because this item includes the sale/turnover from goods & services sold or bartered by trade unit on its own accounts. The sale/turnover should exclude VAT and other similar deductible the sale turnover which are collected from the customers and paid directly to tax authorities, as well as all duties, the item also includes the goods withdrawn by the owner of trade unit for their own used, those goods should be valued at the appropriate market price.
Philippines	Yes. As a result, we will know when a particular establishment has grown and engaged in other activities
Poland	The definition of "Turnover" is used in Poland in accordance with recommendation of Eurostat and it does not include new sub-items presented in this version of document.
Russian Federation	Yes.
Singapore	Yes, we agree that the information is useful. It shall be left to the national statistical offices to decide what data items they shall collect and compile.
Slovenia	Yes
Trinidad and Tobago	Yes, there is the obvious need for clarity given the different terms in use.
UK	It is sensible that the data items and definitions have been revised to reflect SNA 1993. The extension of the turnover variable is, though, very challenging and the would not be able to provide data for some of the additional variables (e.g. receipts for industrial work done or industrial services rendered to others) and it will be interesting to hear the views from other countries of their capability to meet this rather demanding breakdown of turnover.

Country/ Organization	Comments
	It is therefore welcomed that para 4.1 states 'Compilers are encouraged to use the list of data items in accordance with their own statistical circumstances, respondent load and available resources....

**Due to growing importance of E-commerce, E-commerce sales have been identified as a separate item. Do you consider this useful?**

Country/ Organization	Comments
Australia	This is useful
Canada	Yes, it is useful to have E-commerce sales identified as a separate item. However, as the report suggests, a lot of E-commerce sales are done by establishments whose main business is not E-commerce and are therefore not included in total E-commerce sales. Consequently, distributive trades industry-based data are unlikely to provide a good measure of total E-commerce sales.
Finland	Not really, because it's essential what kind of products firms are selling, not by what means. We see that E-commerce is just one among the many method of sales. But a problem comes up when increasing E-commerce via foreign countries to Finland gives downward biased trend of domestic private demand in Finland, when sales are recorded only to firms in foreign countries.
France	Yes
Greece	Yes, it is useful.
Hungary	Yes
Kenya	Yes. In some developing countries like Kenya, E-commerce is now taking root/shape. However, in the near future this will become a significant mode of trading. Treatment of it as a separate item is very much welcome since its usefulness in the future will be quite apparent.
Lithuania	We support the separation of e-commerce sales to a separate item. It ensures the monitoring of the e-commerce extent.
Macao, China	Yes
New Zealand	Yes
Palestine	In Palestinian Territory, we think it's not useful, because the E-commerce transactions involved buyers and sellers, But in general it recommended that their measurement be made from the sellers perspective. Measurement electronic commerce in distributive trade is difficult and often not straight forward for number of reasons: defining what constitutes electronic commerce, involvement of number of multiple interest transaction.
Philippines	Yes. It will be very useful to know how much of the total sales have been generated through E-commerce as well as through other sales channels
Poland	Due to the growing importance of E-commerce which is followed by increasing sales value of transactions done via the internet or other kind of media, Poland finds it very useful and perspective
Russian Federation	Yes
Singapore	Yes, we agree that the information on E-commerce sales is useful.
Slovenia	Yes, very.
Trinidad and Tobago	Very useful
UK	Yes, considering the ever increasing proportion of business conducted via this channel.

**The value of output, trade margin and the value added have been recommended to be compiled at basic prices (the prices recorded in business accounts) as against the producers' prices in the previous recommendations (which also include taxes on products collected on behalf of the government). Do you agree with the change?**

<b>Country/ Organization</b>	<b>Comments</b>
Australia	Yes ABS agrees with this change.
Canada	Yes
Finland	Not relevant question concerning IRDTS?
Greece	Yes, we agree with the compilation of the above characteristics at basic prices without taxes.
Hungary	No opinion
Kenya	Yes. Giving the tax component a separate treatment will enable an assessment on the impact of taxation on the volume of trade. Again one can use these "basic prices" to monitor the marginal effects of change in the management, source of raw materials and other internal policies within the producing entities
Lithuania	We agree with your choice. According to the Regulation of the European Parliament and of the Council concerning structural business statistics, the value added is compiled at basic prices and factor costs. We think that the value at factor costs is a very useful indicator as the impact of taxes is eliminated (the taxes are different across the countries and have a different impact on the value added).
Macao, China	Yes
New Zealand	It is consistent with the SNA.
Palestine	Yes, because the data collected make it possible to calculate both the census output
Philippines	Yes, since this is also one of the recommendations of the 1993 SNA
Poland	Poland adopted the Eurostat way of collection and calculation of financial data, so all released data and indicators are compatible with its requirements. Choice of compilation methods can have significant impact on receiving data and their comparison, so it should be considered very carefully by all economics.
Russian Federation	Yes
Singapore	Yes, we agree with the change as it is consistent with national accounts principle.
Slovenia	Yes, we agree with the change, in order to maintain consistency with valuation concepts for output of national accounts.
Trinidad & Tobago	Yes. SNA 93 recommends that output should be valued at basic prices. Producers prices are the 2 <sup>nd</sup> best alternative if basic prices cannot be obtained
UK	Yes, this is the practice in the .

**The document Integrated List of Data Items for Use in Basic Economic Statistics has been developed by UNSD with the aim of providing countries with a tool that can be used in building up their economic statistics programmes, including the development of statistical questionnaires and other data collection instruments. Do you consider this document is useful?**

Country/ Organization	Comments
Australia	Please refer to the comments for section 3.
Canada	Yes
Czech	Our specialists are afraid that the way of integration as indicated in this document may be administration intensive a lot and they feel some simplification of proposed procedures may be helpful.
Finland	Yes, document is useful, but there should be the final address to website in document, not only mention that document is available at UNSD website.
France	Yes, but in practice it will be often the responsibility of national accountants to calculate "basic prices" from "producers' prices", as structural business statisticians can only approximate basic prices.
Greece	It is very useful and important document.
Hungary	Yes
Kenya	The document is very useful. It will enable harmonization of approaches, concepts and the instruments, thereby enhancing international comparability of the resultant statistics
Lithuania	We think that this document is useful as it covers all integrated items. However, the definitions of Data Items are laid down in all of the documents and might be not useful.
Macao, China	Yes
New Zealand	Potentially useful as a guide.
Palestine	Yes, because it is intended for use in the development of any industry - specific lists, thus ensuring coherence of concepts and definitions across activities, class sizes, geographical areas and ownership arrangements.
Philippines	Yes. This will surely help those who are developing statistical questionnaires on economic statistics
Poland	Yes, It does. It allows to unify and standardize economic statistics programmes which would result in receiving comparable and reliable data regardless of the country provided the statistics data
Russian Federation	Yes
Singapore	The document of "Integrated List of Data Items for Use in Basic Economic Statistics" provides standard data items for integrating and harmonising IRDTS and IRIS. We find the document to be well drafted and comprehensive. We feel that it will serve as useful reference compendium for IRDTS.
Slovenia	To develop a common integrated framework for the compilation of basic economic statistics it is very important to have harmonized definitions of data items. Due that fact we consider document Integrated List of Data Items for Use in Basic Economic Statistics very useful. Irrespective of our general opinion, Slovenia is EU member state so we need to respect EU regulations from the field of distributive trade statistics.
Trinidad and Tobago	Yes. It is useful for consistency across countries and as a guide for countries in their choice of data items
UK	1. The document is useful regarding the aim of providing countries with a tool that can be used in building up of their economic statistic programmes. The list of variables is, though, incredibly challenging, so again the statement within the introduction of this section 'Compilers are encouraged to use the list of data items in accordance with their own statistical circumstances, respondent load and available resources...' is important.  2. Footnotes in Annex 1 include ** measurement of census output and *** the indicated items are believed to be of limited significance for distributive trade

Country/ Organization	Comments
	units..... There appears to be no ** or *** assigned to any of the variables within the table.
Eurostat	It is useful.
OECD	<p>Data items listed in the revised draft of IDES cover a reasonable range of indicators. We found that the revised draft reflects most of our comments previously provided in writings on November 2007, except our comments on Statistical Data and Metadata Exchange (SDMX), production workers and provision of short-term indicators. The followings are our previous comments on the three outstanding issues:</p> <ol style="list-style-type: none"> <li>1) Reference to the relevance of SDMX initiative in which UNSD is a participant, would include how the SDMX standards could be used to develop consistent / common terminology at the national level and their use in the efficient exchange of data and metadata both between national agencies and to international organizations. We would also give some thought to the development of an international Glossary in which the terms included in the list could be posted and made more readily available to national users. Such a Glossary could be expansion of the existing UNSD Glossary and be done in conjunction / co-operation with the OECD (with its OECD Glossary of Statistical Terms) and Eurostat (with its CODED).</li> <li>2) As regard to 'Production workers' and 'other employees', it seems that the UN has tried to break production workers out a bit into the categories as listed below, but this seems a bit piecemeal. For example, it may be that the categories of Research and development and Software and database development are new, but the former reflects the Frascati Manual initiative and we're not sure of the origin of the latter but it seems to be that the UN haven't really gone far enough to try and reflect the main type of work done today in the services sector of the economy - rather the UN have just looked at work that may have been done in some specific sectors and included it in the breakdown. We think the UN should have put further effort into developing a meaningful categorization in this area and reflect current economic structures and not past ones.</li> <li>3) We would expand the reference to infra-annual statistics in para. 4 of the Introduction to give further emphasis of the relevance of the List to the provision of short-term indicators. Such text would include brief mention of the relationship between such indicators and annual data and the processes for achieving consistency through benchmarking, use of common concepts, etc.</li> </ol>

## Chapter V: Performance indicators

**This is a new chapter providing guidance on measurement of overall performance of distributive trade sector. Do you consider this chapter useful and the coverage of the chapter adequate?**

Country/ Organization	Comments
Australia	The chapter is useful and the coverage adequate. However it would be useful to clarify the scope of the recommendation re annual and quarterly core indicators. The recommended indicators are useful except possibly output/person employed, value added/person employed, share of e-commerce in total sales and retail trade/wholesale trade turnover index.
Canada	Yes
Finland	Yes
France	Yes
Greece	Yes, the chapter is useful with adequate coverage.
Hungary	Yes
Kenya	Yes
Lithuania	In principle, yes. However, in the new EU SBS Regulation it is foreseen to scrap the indicators such as structure of wholesale turnover and structure of retail trade purchases.
Macao, China	Yes
New Zealand	Some of these indicators are undoubtedly useful, but some also potentially could only be compiled at a cost of very high respondent burden. For example, the "structure of wholesale trade turnover" indicators. Many businesses cannot necessarily accurately identify the type of customer by sale. Statistics New Zealand would need to have a defined user need before compiling these statistics. We already have some of these data, but wouldn't necessarily develop more of these statistics due to respondent burden issues and other priorities. This section is potentially useful, should a statistical organisation want to explore such indicators.
Palestine	Performance indicators is a policy relevant variable, it's can be any ratio that summarized two or more important measurements, performance indicators is powerful instruments to present complex information. And it's allowed retailers and wholesalers to develop their own performance measurement programmes. It's suitable tool for academicians and researchers who use them for making comparisons across countries and industries and overtime and for identifying factors that lead to better performance.
Philippines	Yes, this is useful since with the growing contribution and expansion of the trade sector, policy-makers would benefit from a better articulation of the data on distributive trade
Poland	We consider that this chapter is useful and the coverage of it adequate.
Russian Federation	This chapter is useful and the coverage is adequate
Singapore	Yes
Slovenia	Yes, because the chapter includes set of indicators for monitoring and measuring the overall performance of distributive trade sector - and with those indicators we can compare distributive trade with other industries in Slovenia and internationally.

<b>Country/ Organization</b>	<b>Comments</b>
Trinidad and Tobago	Yes
UK	There is potentially little debate about the usefulness of such indicators and the suggested indicators in the sections on Growth Rate and Ratio Indicators within Types of performance indicators are sensible. I think the performance indicators recommended within the section 'Additional indicators' are challenging; I'm also unsure about the value of a number of the indicators that have been suggested i.e. structure of wholesale trade turnover and structure of retail trade purchases when compared to the cost of collecting such data and the ability of respondents to provide the data. It is therefore welcomed that para 5.30 when referring to the 'Additional Indicators' states 'it should be noted that their compilation require collection of additional data, thus increasing significantly the burden on respondents. Countries are advised to collect this information only if their own circumstances warranted the collection of such data.'
Eurostat	It is useful.



## Chapter VI: Data sources and data compilation methods

**This is a new chapter that has been added to assist countries identify different sources of data and compilation methods for distributive trade statistics. The chapter includes also a section discussing data collection strategy based on an integrated approach covering production units across all size classes and activities. Do you consider this chapter useful and the coverage of the chapter adequate?**

Country/ Organization	Comments
Australia	This chapter would benefit from greater detail in the introductory section ie some paragraphs that focus on key issues relating to data compilation methods eg administrative data, availability of a business register, and the issue of respondent burden.
Canada	<p>Overall, this chapter seems quite useful and comprehensive. However, it seems to have a bias against the use of administrative data. Administrative records such as income tax, payroll deductions and sales tax remittances can enrich both frame creation/maintenance and the estimates. Statistics Canada uses administrative data in combination with surveys for frame analysis, sampling, editing (comparing reported values to what was reported on tax returns), imputation (using tax data where possible to replace non-response), estimation (including small units below sample thresholds) and data validation. Besides cost savings, administrative data can improve the overall quality of the estimates.</p> <p>Some specific comments are as follows:</p> <p>Comment on Paragraph 6.31: A centralized Business Register should also ensure better coverage of the population in the frame, without overlap or duplication.</p>
Finland	Yes
France	Yes
Greece	Yes we do.
Hungary	Yes
Kenya	Yes
Lithuania	Yes, we do. More detailed guidance on the relevant good practices that will be provided in the Distributive Trade Statistics: Compilers Manual, which is to be issued as a follow-up publication to the current recommendations, is welcome, and we believe that it will be useful for reducing the response burden on businesses.
Macao, China	Yes
New Zealand	Yes
Palestine	This chapter is useful and coverage because the original source of the data in this chapter are: 1) Statistical data source. 2) Administrative data source. In PCBS the main source of the data is statistical data source that comes from the economic surveys, by using samples from the establishment census.
Philippines	Yes, this is useful and adequate since there is already a discussion of the methodology for capturing a large portion of the Philippine economy – the informal sector
Poland	<p>Yes, It does.</p> <p>It gives basis information about data sources an data compilation methods.</p>

<b>Country/ Organization</b>	<b>Comments</b>
Russian Federation	This chapter is useful and the coverage is adequate
Singapore	Yes
Slovenia	Yes, we consider this chapter useful. In order to lower the response burden of enterprises and to eliminate administrative barriers in short-term statistics we already compile the monthly turnover indices using the administrative source.
Trinidad and Tobago	Yes
UK	1. The chapter is generally useful, I would think, though, (as IRDTS suggest) users will be very interested in more detailed guidance that will follow in the 'Distributive Trade Statistics: Compilers Manual that will be follow.  2. I wonder whether there should be other (rather than just 'FIRST') survey methods covered within Section D - Survey Method (albeit countries are simply encouraged to review FIRST as an option). For example in para 6.55 c, administrative sources are suggested as an option to measure small businesses.
Eurostat	This chapter is useful as a guideline. The situation and practical implementation can however differ considerably across countries.

### **Any additional data collection strategy to be included?**

<b>Country/ Organization</b>	<b>Comments</b>
Australia	Chapter might be enhanced by discussion of the different options for using administrative data, such as combining administrative data and survey data in various ways eg for modelling, for covering smallest portion of the population that contributes little to estimates but makes up a large number of units in the population, or for enhancing accuracy in final releases.
Canada	As mentioned above, combined strategies using both administrative data and surveys together should be included.
Finland	Strategies for the use of administrative data could be elaborated. In some cases administrative data may not be sufficient alone or is of rather poor quality, but can still be used as supplementary data
Greece	We suppose that no additional strategy for data collection is necessary.
Hungary	We haven't got any proposals.
Kenya	n/a
Lithuania	No
Macao, China	No
New Zealand	Perhaps an addition of a statement of risk when using private administrative data providers. Government providers can be much more stable and reliable long-term, but private providers have their own needs (such as changing to the nature of their business to remain competitive and viable) which may make some private administrative data sources high risk for long term compilation of statistics.
Palestine	Nothing
Philippines	We feel that the draft has exhausted all possible data collection strategies known to us
Russian Federation	If countries have such experience
Singapore	No. Any practical guidance on data collection shall be included in the Compilers Manual.
Trinidad and Tobago	Surveys and Censuses are the only means whereby comprehensive data can be

<b>Country/ Organization</b>	<b>Comments</b>
	obtained. Tax returns filed with the Tax authorities are also valuable but most times unavailable.
UK	I would describe this perhaps more as a sampling (rather than data collection) strategy. Also do data collection strategies belong more in the proposed compilers manual?

## Chapter VII: Short-term distributive trade statistics

**This is a new chapter that has been added to provide a link between annual and infra-annual distributive trade statistics and to discuss some of the important aspects of the short-term distributive trade statistics, such as the compilation of distributive trade indices and the necessity of seasonal adjustments and benchmarking. Do you consider this chapter useful and the coverage of the chapter adequate?**

Country/ Organization	Comments
Australia	ABS considers that this chapter is useful, and is comfortable with the material contained within it.
Canada	<p>In 7.9 it suggests that monthlies should be released within a month of the end of the reference period. This is not feasible given that respondents need time to provide the information and there are a number of processing, analysis and dissemination steps that must take place. A 2-month window would be more realistic.</p> <p>The chapter assumes that the quality of sub-annuals is lower than that of annuals. Sub-annuals generally collect less detail, but the quality of the few variables can be of better quality than the same variable collected on an annual.</p> <p>When benchmarking there are a number of reconciliation activities that have to be considered such as differences in scope of the target population between sub-annuals and annuals. There may be very valid reasons to have two series with differing annual totals provided the differences are thoroughly explained to data users. I would not support an arbitrary exercise to change the scope of one to that of the other for the sake of benchmarking when the estimates are different by design even if it does make things simpler for certain users. The series breaks and large revisions brought on by benchmarking can be more problematic than the explainable differences in series. In addition, it can be very difficult to preserve the trend in growth rates of the sub-annual when benchmarking to an annual.</p>
Finland	Yes
Greece	We consider that a link between annual and infra-annual distributive trade statistics is necessary and facilitate the comparison of the indices with the annual results.
Hungary	Yes
Kenya	Yes
Lithuania	<p>This new chapter covers all important aspects of short-term distributive trade. We do not compile wholesale trade turnover volume indices and wholesale price indices as they are not required by the EU STS Regulation.</p> <p>However, the recommendation to use Producer Price Indices as suitable price indices to deflate wholesale trade is indeed acceptable.</p>
Macao, China	Yes
New Zealand	Yes
Palestine	Short-term distributive trade statistics are an important source of information for developing and monitoring effectiveness of economic policy.

Country/ Organization	Comments
Philippines	Yes this will be useful, but will be very difficult for resource-constrained statistical system since one of the recommendations is a monthly monitoring of trade indicators
Poland	This chapter is very useful, because contains many interesting problems concerning short-term distributive trade statistics.
Russian Federation	This chapter is useful and the coverage is adequate
Singapore	<p>Yes. However, we would like to provide our comments for the following two paragraphs in the chapter:</p> <p>7.37(b) Moving Holidays - Chinese New Year (pg 139) &gt;&gt; As the statement is vague, we suggest that it be rephrased or omitted.</p> <p>7.67 Benchmarking and Seasonal Adjustment (pg 146) &gt;&gt; We suggest to include a direct reference to paras 7.48 and 7.49 Seasonal Adjustment and Consistency with Annual Data (p 141) as they are closely related.</p>
Slovenia	As we are EU member state we carry out short-term statistics according to the EU STS Regulation. An interesting and very important part of this chapter is benchmarking.
Switzerland	<p>Chapter 7, Point 7.5. We can read "Econometric methods and indirect estimation procedures should not be accepted as a substitute for data collection." - This remark is of highest importance</p> <p>Page 141, point 7.47. We can read "Minimum length of the time series for seasonal adjustment" - Are the minimum duration of 3 or 5 years applicable for both monthly and quarterly surveys?</p>
Trinidad and Tobago	Very useful. Distributive trade statistics by their very nature are most useful as short term indicators. We need to recognise however that most countries compile quarterly GDP, hence I see no problem if some of the Statistics are done quarterly. I find the general discussion in Index Numbers to be very appropriate
UK	<p>Strongly support the inclusion of a section on short-term distributive trade statistics and generally the coverage and content of the chapter is adequate. A few comments:</p> <p>i) para 7.5: states econometric methods and indirect estimation procedures should not be accepted as a substitute for data collection. I wonder whether such a sweeping statement should be made. For example does the appropriateness of 'modelling' depend on the data content of the model (and whether the data used are 'official') and how the actual model is used e.g. the model may be used in the short term for flash estimates when data are scarce; the model estimate to then be ultimately replaced with an estimate that is 'richer' in data (perhaps sourced from survey or admin sources). The key element is perhaps that the methods used and the reliability of the estimates are both made available to users.</p>
ESCWA	Regarding the draft manual on distributive trade, we have just one comment, relating to paragraph 7.24(b). It is proposed that the first sentence may be revised as " <b>The cycle component ( t C ) indicates the shorter term (with respect to trend) regular fluctuations, usually referred to as business cycle.</b> "
Eurostat	It is useful. The colleagues of the STS UNit in Eurostat may get back to you on this issue after the Xmas holidays.

**Any additional issues related to compilation of short-term statistics to be included?**

<b>Country/ Organization</b>	<b>Comments</b>
Australia	No
Canada	With respect to (C) 7.2.1 and 7.2.2 Seasonal adjustments Need for seasonally adjusted distributive trade statistics, there are benefits to the seasonal adjustment of infra-annual data. However, current seasonal adjustment techniques do not fully adjust for structural changes particularly in retail trade such as the increased use of dealer incentives for retail car sales which have changed the normal seasonal pattern of car sales in Canada. These changes may not constitute a break in the series as is discussed in section 7.4.7 but they are problematic in interpreting short term trends in the data.
Finland	In some countries standard working day adjustments should not be recommended in trade statistics. In Finland some Sundays are trading days and some are not. Current generally available calendar correction methods do not support this effect and using them leads to deterioration of published data.
Greece	No comments.
Hungary	We don't have any suggestions
Kenya	n/a
Lithuania	No
Macao, China	No
Palestine	Nothing
Philippines	No further issues
Poland	Elementary matters are included.
Russian Federation	No.
Singapore	No
Trinidad and Tobago	No. I cannot think of any
UK	I think the chapter is adequate but wonder whether it would be better to have 'Seasonal Adjustment' has a separate stand alone chapter?.

**The section for distributive trade indices provides some policy guidelines on their compilation. More detailed recommendations will be provided in the follow-up publication *Distributive Trade Indices: A Handbook of Country Practices*. Do you agree with the general recommendations in para. 7.11 that chained-linked Laspeyres index with the weights being updated at least every five years is the preferred approach for the compilation of turnover volume indices?**

<b>Country/ Organization</b>	<b>Comments</b>
Australia	No comment
Canada	Yes
Finland	Yes, but not more often than every 5 years. Weights are updated 'naturally', when the baseyear is changed.
Greece	Yes we agree.
Hungary	Yes
Lithuania	Yes, we do.
Macao, China	Yes

<b>Country/ Organization</b>	<b>Comments</b>
New Zealand	Statistics New Zealand does not currently produce any turnover volume indexes, and is unlikely to produce any in the foreseeable future.
Palestine	Yes, because the index formula satisfied most of criteria such as monotony, homogeneity.
Philippines	We agree to this approach since we would like to monitor short-term movements of the sector
Poland	We agree with recommendation concerns the index for the compilation of turnover volume indices. The weights for chained-linked Laspeyres index are updated every year in CSO of Poland.
Russian Federation	Yes. In the Russian statistics weights for index calculation are updated annually
Singapore	Yes, we agree that Laspeyres index with weights being updated at least every five years is the preferred approach for compilation of turnover volume indices.
Slovenia	Yes (also EU STS Regulation suggests period of five years to update the weights).
Trinidad and Tobago	Yes since it is also recommended that national Accounts be rebased at intervals of five years. I also think it is very practical and rooted in reality. It is no use having a theoretically superior procedure that cannot be implemented in practice.
UK	Would it be better for IRDTS to suggest the options (which the current draft has done so to a certain extent with references to Paasche and Fisher) and then the advantages and disadvantage of each approach. Users can then make an informed decision on the approach most suitable to their individual circumstances.

## Chapter VIII: Data quality and metadata

**This is a new chapter discussing data quality and metadata relating to distributive trade statistics. Do you consider this chapter useful and the coverage of the chapter adequate?**

Country/ Organization	Comments
Australia	Chapter is useful and coverage adequate.
Canada	Yes
Finland	Yes
France	Yes
Greece	This chapter provides new methods for data quality measurements, so it is very useful.
Hungary	Yes
Kenya	Yes
Lithuania	The concept of a new chapter on data quality and metadata is strongly supported, the coverage of this chapter is adequate. The recommended dimensions of quality (relevance, credibility, accuracy, timeliness, methodological soundness, coherence and accessibility) helps to ensure a consistent approach to existing standards.
Macao, China	Yes
New Zealand	Yes
Palestine	Yes, the data quality is important things in any survey, the quality measurement of distributive trade statistics is concerned with providing the users with sufficient information to judge if or unless data are adequate for their intended use.
Philippines	Yes, it will contribute towards a more standardized and systematic statistical measure and reporting across countries
Poland	We consider that this chapter is useful and the coverage of it adequate.
Russian Federation	This chapter is useful and the coverage is adequate
Singapore	The chapter is useful and the coverage is adequate.  IRDTS proposes the quality dimension of methodological soundness (Para 8.4 f). It is measured by number and rates of differences in concepts and measurement procedures used in the collection/compilation of distributive trade statistics from the relevant international statistical standards. We feel that countries may deviate from the method recommended in the international statistical standards in consideration of national statistical environment and users' requirements and the deviation does not necessarily mean that it is methodologically unsound.  We suggest that the description of the quality dimension be amended to "comparability and interpretability" as the indicator actually measures the degree of international comparability of the distributive trade data.
Slovenia	Yes, because of growing importance of data quality.
Trinidad and Tobago	At the end of the day, the integrity and quality of the data are what matters most.
UK	Yes.
Eurostat	It is useful



## Chapter IX: Dissemination

**This is a new chapter added to provide guidance and recommendations on the dissemination of distributive trade statistics and presents selected data items identified for international reporting with annual and infra-annual periodicities allowing analysis of the dynamics, structure and growth by activities and size classes. Do you agree with the list of annual and infra-annual dissemination variables identified for international reporting?**

Country/ Organization	Comments
Australia	ABS is comfortable with the proposed dissemination variables, but suggests that a smaller sub-set of the list should be for the purpose of international reporting, with the remainder of items restricted to internal use by and usefulness of the reporting country. It should be noted that what NSO's publish is dependent on their circumstances and their users particular needs, however this list seems to be consistent with the range of information that most users want in respect of DTS.
Canada	<p>Statistics Canada could probably provide most of these data at least at an aggregate level with the following caveats:</p> <ul style="list-style-type: none"> <li>• monthly data would not likely be available within 45 days of the reference month; Statistics Canada's fixed release dates are within 55 days of the reference month (Wholesale trade data are released a few days earlier than retail trade data.);</li> <li>• Canadian data are classified by industry, not by activity;</li> </ul>
Finland	Yes
Greece	Yes, we agree with the list of the variables concerning the dissemination of DTS.
Hungary	We don't plan the production of the whole sale volume indexes for a short run.
Kenya	yes. Although the suggested annual and infra-annual variables are fairly quite okay, there is need to improve on the way they are presented in reports. A mere combination of text, figures, proportions and percentages can sometimes make very boring statistical reports. To enhance the visual appetite to the reader of such reports, graphical presentations should be emphasized as opposed to just tabulation of figures. The reports should also include beautiful pictures and cartoons.
Lithuania	Wholesale trade turnover indices (value only) are currently required with quarterly periodicity by the EU STS Regulation.
Macao, China	We agree with the annual dissemination variables identified for international reporting; however, we consider that the implementation of this reporting will depend on the availability of resources and the capacity of the NSOs or government agencies concerned.
New Zealand	While Statistics New Zealand agrees with the concept of supplying variables on distributive trades for international reporting we would prefer variables to be recommendations rather than prescriptive due to data constraints. For example, the annual data listed are partially available from Statistics New Zealand, but the level of detail breakdown is too detailed (we wouldn't release the data at these levels) and the data is not available until approximately 37 months after the reference period.

Country/ Organization	Comments
Palestine	Yes, because PCBS disseminate the data of the distributive trade survey annually.
Philippines	Our national Statistical Office actually generates these specific statistics on a quarterly basis, but they are not being published although they are used in the compilation of the national accounts. For the annual international reporting, this could pose some problems because under our System of Designated Statistics, the release of the annual survey that contains these variables is released 24 months after the reference year, as opposed to the recommendations of IRDTS which is within 18 months after the reference period. However, we recognize the merit of the recommendations and agree that it should be part of the recommendation.
Poland	Poland adopted the Eurostat way of dissemination of selected data but according to our current methodology we can not calculate data for small enterprises employing 1 and 2-9 persons employed.
Russian Federation	Yes
Singapore	Yes
Slovenia	According to the table 9.3 we agree with deadlines for retail trade turnover index, while for wholesale turnover index we don't agree with proposed timelines (t+45). According to EU STS Regulation we need to report data on monthly turnover in wholesale in t+60. Annual dissemination variables are covered by our structural business statistics.
Switzerland	On chapter 9 (International Reporting) Pictures 9.1, 9.2, 9.3 give a very good overview of what is important to publish. -A comparison with other international recommendations (EUROSTAT) would be most welcome.
Trinidad and Tobago	They are realistic. They consider the demands placed on NSO. You opted for only one monthly indicator. This is very commendable.
UK	I agree with them all except for the provision of monthly wholesale, retail and motor trade indices data within 45 days. The would not be able to provide such data until around 60 days. It will be interesting to hear the views of the capability of other countries to meet this target.
Eurostat	The EU Member States will not be in a position, based on the EU Regulations to provide all the information required. It will not be possible to provide information based on Structural business statistics on the gross fixed capital formation (SBS is limited to investments in tangible goods).

### Part III. Other specific comments

Country/ Organization	Comments
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