The SSCU has considered the draft of the Guidance on Integrated Economic Statistics and presents comments on it.

The draft Guidance is a document which establishes the general principles for economic statistics, concepts, definitions, classifications, methods to assess, etc that are common for all countries and has important conceptual and practical significance. It is a useful tool for obtaining the statistical estimate of the national economic activity which is comparative across the countries.

First of all, it is important that the mentioned document contains not only the description of the general principles and advantages of the integrated economic statistics from users' point of view, but also the recommendations on the integration of selected components for economic statistics by stage of work in order to implement the integration processes within the framework of centralized and decentralized statistical systems.

For its practical usage by the state statistical system of Ukraine, the draft Guidance is relevant from the point of view of outlining the basic problematic issues and tasks in the area of economic statistics, whose implementation is envisaged by the Concept to develop the state statistics of enterprises of Ukraine and the Strategy to develop the state statistics till 2012. This concerns the following:

-   strengthening the statistical coordination, methodology and organization as well as tool for information and communication technologies;
-   decreasing the reporting burden per respondents through the integration of statistical surveys, the conduct of sample surveys, upgrading the usage of administrative data, etc.

Also, the mentioned document contains information on harmonization of standards from enterprise statistics with standards from macroeconomic statistics (SNA 2008) and identifies the advantages and main principles of integration of economic statistics.

In our opinion, the positive thing is the availability in the Guidance of specific practical examples about the integration of the national statistical systems. Thus, Chapter 6 *Dissemination of Information and Communications* describes a good practice established for disseminating statistical information and presents the examples of establishing ties both with users and between statistical offices of different countries which demonstrate the usefulness and relevancy of upgrading the significance of statistical information for a wide circle of users and permits to draw the conclusions about the quality of disseminated data. The provision of the effective access to data and metadata in particular to those users who participate in economic analysis and develop the relevant policy should be the priority for the further activity of statistical offices. This must be implemented by applying modern information technologies that facilitate not only quick but free access to statistical information for different groups of users.

However, the following should be taken into consideration. If this document is adopted, the other documents that regulate international standards for producing statistical data in selected sectors of the economy first of all in agriculture must be significantly amended

and changed. The principles of collecting statistical information about agriculture activity have its features in all basic positions presented in the draft Guidance on integrated economic statistics. Therefore, the integration of agriculture statistics into economic statistics will be the most complicated and problematic.

In our opinion, the main approaches to organization of agriculture statistics are presented in the Case Study (page 39) and also the potential changes in the current methodological and organizational manuals on selected issues of agriculture statistics require the detailed discussions by experts in agriculture statistics from the national statistical offices. Therefore, it would be appreciated if certain references to more detailed methodological manuals on agriculture could be made as it is the practice with the other sectors of the economy (for example, pages 122-123). Either it should be indicated that they require the relevant changes due to the adoption of the draft Guidance on integrated economic statistics.

On the whole, the draft Guidance contains only the basic approaches, principles of integrated economic statistics. Thus, it is necessary to develop the new or make reference to those that already exist more detailed specific methodological instructions on the main issues of integrated economic statistics reflected in this document.

At the same time, it would be appreciated if the mentioned document would make use of generally accepted terms particularly this concerns the types of statistical units presented in Chapter 5 where instead of term Local Unit specified by EU Council's Directive 696/93 of 15.03.1993 the term Establishment is used.