

UNITED NATIONS
DEPARTMENT OF ECONOMIC AND SOCIAL AFFAIRS
STATISTICS DIVISION

**Global Consultation on
Draft International Recommendations for Industrial Statistics 2008**

Comments received from Countries and International Organisations

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Part I: General comments

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

Country/ Organisation	Comments
Armenia	National Statistical Service has no comment and recommendations on International Recommendations for Industrial Statistics 2008 and International Recommendations on Distributive Trade Statistics 2008
Australia	--
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.</p> <p>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. 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>
Azerbaijan	No comments
Botswana	<p>We thank UNSD for this initiative. The IRIS will not only enhance the knowledge and practice in the collection, processing and compilation of industrial statistics but will also help in building capacity for national statistical offices. We welcome and appreciate the development.</p> <p>We have looked at the recommendations. They are easy to understand and applicable in most situations. However, although most of the chapters have been covered well, we think Chapter VI(Data sources and data compilation methods) needs to be expanded as it is the core of the recommendations. Real life examples should be included in the Imputations section to show how the different imputation methods could be applied. The same thing applies to the section on Grossing up Procedures and Aggregation.</p> <p>One may also wonder how the value added calculated in industrial statistics differs from that produced in national accounts. Is the production boundary the same in the two types of statistics? Maybe the recommendation needs to include a chapter that shows the difference in the statistics produced under industrial statistics and national accounts.</p>

Country/ Organisation	Comments
Bulgaria	The draft International recommendations on industrial statistics is a comprehensive set of recommendations, it provides comprehensive methodological framework for collection and compilation of industrial statistics for countries at different level of development of their statistical system.
Canada	<p>We congratulate the UNSD for preparing a revised set of recommendations for Industrial Statistics. The document achieves a good balance for all NSO's including those in developing countries.</p> <p>We would like to see a broader interpretation for industrial statistics to cover services statistics as well.</p>
Chile	The publication provides a clear and simple recommendations for industrial statistics and is a big contribution to the standardization of statistics between countries.
Costa Rica	No comments
Czech Republic	---
Finland	<p>The recommendations are extensive and generally good. The update has captured well the economic globalisation and the increased demand for international economic statistics. In the long term, international recommendations will improve the comparability and usability of different national statistics. The current version of the draft seems to be well finished.</p> <p>We have attached a separate document concerning Chapter I, Section – E Outsourcing</p>
France	There is still a contradiction between the support to "establishments" and the numerous references to "structural business statistics of enterprises" (and "kind of activity units"), which define "good practices" and a better "integration" with National Accounts. The fault is in the SNA which has not yet dropped out the reference to establishments. However, the income approach which is now strengthened in the National Accounts and in the international classifications of activities and products (as they rely more and more on concepts of ownership) is not understandable in a world of "establishments". In our experience, "establishments" do not know their "production costs", neither the enterprise for its establishments.
Greenland	Thank you for the request for commenting on the draft documents, we appreciate the opportunity to be able to contribute to the work within the UN Statistics Division. This time, however, Statistics Greenland 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.
Hong Kong China	The new IRIS is useful for statistical agencies in enhancing their statistical systems on industrial production statistics.
Hungary	The presentation is clear and very useful.
India	I have gone through the draft sent and find that all the points discussed have been taken care of. Therefore, we do not have any specific comments to offer.
Italy	Italy appreciates the revision carried out on the IRIS and IRTDS latest drafts; anyway, it could be useful to highlight that variables contained in IRIS draft are more disaggregate

Country/ Organisation	Comments
	compare to the ones in the SBS Regulation on industrial statistics.
Japan	Concerning your letter dated 12 November 2007 (Your Ref: STAT 221(1)), we do not have specific comments on both IRIS 2008 and IRDTS 2008 after consultation with the ministries concerned.
Kenya	The new recommendations have been well documented and also well researched on given the references quoted throughout the document. The recommendations are highly appreciated given the economic and statistical developments that have taken place since the last revisions. This will also enhance uniform measurement of industrial activities both at national and international level.
Lithuania	<p>The recommendations are very comprehensive and cover all areas, specific for the production of industrial statistics. We think that the recommendations should be extended, namely the part concerning quality. On the other hand, extended recommendations lose their sense and become a manual.</p> <p>The distributive trade survey is mentioned as an example. In the part concerning industry, the Industrial Statistics Survey should be mentioned (e.g. in parts 6.26, 8.11 (a) (c)).</p>
Macao China	We consider that the topics in the draft recommendations are broad-based and in line with the developmental and operational changes of this sector. Contents of the draft recommendations provide useful details to both the stakeholders and data compilers.
Mozambique	<p>The recommendation will help to increase the quality of industrial statistics. Some of the recommended practices are implemented now in Mozambique to production of industrial statistics (statistical confidentiality, equality, objectivity). Our Statistical units are enterprises and establishments. In industrial survey, the information about identification code, location, kind of activity, employers and salary, volume of production, average price and the value of production are collected. We don't collect now data and characteristics about number of part-time employers.</p> <p>Finally the IRIS has rich contents that will show the big way to implement the international standards in production of industrial statistics.</p>
New Zealand	The recommendations appear to be largely compiled from other existing manuals and as such are detailed and informative.
Palestine	The document issued has several useful items distinguished by clarity and reviewed extensively in this document which has come up with new recommendations designed to improve practice in the field of industrial statistics, also it present the progress made in preparing the revised international recommendations. We express our great appreciation for inclusion of all issues relevant to this economic activity in a single document. The need to make Arabic language documents for the new classifications revisions, and circulated to the Member States, to adopt them in accomplishing national classifications of each State.
Philippines	We find the current draft very useful and comprehensive. We suggest an additional chapter on advocacy for industrial statistics, particularly in the conduct of establishment surveys, including strategies on how to increase the response rate in industrial surveys.
Poland	--
Russian Federation	Development of new recommendations on industry statistics is relevant and timely in connection with transition to state information resources in the Russian Federation in accordance with the international standard classifications.

Country/ Organisation	Comments
Singapore	We do not have comments on the IRIS 2008.
Slovenia	<p>The clarity of presented recommendation is good. Another general comment about the document:</p> <p>Since Slovenia is the member state of the European Union for quite some time now, we generally agree with all the recommendations that are in line with the European regulation. Despite the availability of methodological manuals from Eurostat, we find your recommendations very useful because of its exhaustive view on the field of treatment.</p>
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	<p>The UNSD recommendations on Industrial Statistics are very relevant. This draft represents a huge amount of work that will be very useful for every countries concerned by its content.</p> <p>Switzerland is currently reconsidering all of its structural and conjuncture statistics, this being part of a bigger program reengineering economic business statistics. Going through that process, this UNSD draft manual is of precious help. Currently it is too early to say if Switzerland will cover all of the recommendations made. In the short term it is likely that certain variables will not be produced by Switzerland, more specifically the energy and the water consumption variables.</p>
IMF	<p>We 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). We would like to congratulate you and your staff for producing these two manuals.</p> <p>While the IMF has not been directly involved in the work leading to these two documents, we 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>. We 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.</p>
ESCWA	<p>Paragraph 11 of 'Introduction' states "... egular, occasional or irregular inquiries into specialized subjects are not dealt with in this publication". But, paragraphs 7.52 to 7.57 deals with, though very briefly, baseline surveys (once in five years) and reconciliation of results of annual surveys with its results.</p> <p>Revising the scope of the manual in paragraph 11 may be considered.</p> <p>The draft gives an impression that the baseline surveys carried out once in (say) five years are is not recommended. But the necessity of carrying out such surveys in countries with large informal sector can not be wished away.</p>
Eurostat	The recommendations manual for distributive trade statistics includes a chapter on short term statistics: why is such a chapter not included in the manual on the industrial statistics?
OECD	(i) English needs to be tightened up unfortunately. The document's littered with grammatical errors but given its draft status that may be normal, still, it'll be just as well to point this out all the same.

Country/ Organisation	Comments
	(ii) This concerns our earlier comments relating to business demography statistics. It seems that they've not taken these on board or perhaps have misunderstood what we meant by business demography stats. If this is deliberate that's fair enough as the document isn't really designed to motivate the development of BD statistics but still it's an opportunity missed in my view, although, given the release of the Eurostat OECD Manual on BS statistics, this perhaps isn't so critical. All the same as my comments below show they'll need to better articulate what they mean by demography

Part II: Comments on specific draft chapters or passages

1. INTRODUCTION

In the *International Recommendations on Industrial Statistics (IRIS 2008)* and the *International Recommendations on 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	
Australia	--	Yes	<p>ABS supports the narrow interpretation. While ABS supports the usefulness of the principles, concepts and definitions of data items, we feel that the IRIS is primarily for guidance and a framework. We wish to reinforce the message that NSOs need to assess the applicability and practicality to their situation, taking into account their circumstances eg identified user needs, resources, priorities, respondent load. Our concern is that the IRIS will be viewed as 'best practice' and NSOs may pursue all recommendations without due regard to their circumstances eg I would not consider it 'best practice' for an NSO to impose very significant response burden and high operational costs to collect information that might be of marginal utility in their particular circumstance.</p> <p>The chapter titled Data Quality and Metadata could usefully be moved into the 1st group above, under narrow interpretation.</p>
Azerbaijan	--	--	No comments
Botswana	Yes	--	--

Country/ Organisation	Interpretation supported		Comments
	Broad	Narrow	
Bulgaria	--	Yes	--
Canada	Yes	--	We support the broader interpretation as many of the recommendations apply to more than industrial statistics as defined in the document and many of the issues concerning definitions, methods, dissemination, data quality and performance indicators are common to these other sectors. We would add that there are economies associated with collection and dissemination if the recommendations were applied more broadly.
Chile	Yes	--	We support the broad interpretation
Costa Rica	--	--	No comments
Czech Republic	Yes	--	Narrow interpretation is also acceptable.
Finland	Yes	--	Common international recommendations are necessary to improve comparability of international statistics.
France	Yes	--	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.
Greenland	--	--	No comments
Hong Kong China	--	Yes	While some international guidelines on the compilation and dissemination of industrial statistics are needed for facilitating international comparison, flexibility should be allowed for individual economies in compilation and dissemination of statistics which could take into account their local situation and development.
Hungary	Yes	--	The broad interpretation gives a comprehensive approach.
Italy	--	--	--
Japan			No comments
Kenya	Yes	--	We are looking at broad performance of our economies and also trends of the industrial data requests. This cannot be narrowly looked as definitions and concepts need to be harmonized for them to be also comparable internationally.
Lithuania	Yes	--	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 those producing statistics, namely in the countries, where the statistical system is not well-developed yet. In order to prepare a quality report on certain indicators, countries need more detailed clarifications of certain indicators defining quality.
Macao China	--	Yes	The fact that the entire sector of industrial production comprises less

Country/ Organisation	Interpretation supported		Comments
	Broad	Narrow	
			than 2,000 establishments in Macao China: therefore we suggest keep the broad interpretation as an optional extension to the developing economies.
New Zealand	Yes	--	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	Yes	--	We think that the international recommendations on industrial statistics in a broad sense be comprehensive in terms of structure and content, and expected to become a reference document of the statistical agencies.
Philippines	--	--	In terms of operationalisation or implementation, some consideration should be given to the present state of developing countries. The above characterisation (narrow vs. broad) should be revisited considering what is important and doable in most countries.
Poland	Yes	--	--
Russian Federation	Yes	--	With regard to this document the term "International recommendations" may be applied in a broad sense.
Singapore	--	Yes	--
Slovenia	--	Yes	--
Sweden			No comments
Switzerland	Yes	--	--
ESCWA	Yes	--	--
Eurostat	--	Yes	<p>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 that are regulated at the 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 the 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 the national accounts concepts. NSI will have to collect additional information to allow compiling 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 is clear that we will not move to this approach in the European Level in the near future.</p>

Country/ Organisation	Interpretation supported		Comments
	Broad	Narrow	
OECD	--	--	--

The reasons for revision of the *IRIS* are mentioned in paragraph 4 wherein references have been made to changes in concepts, definitions and terminology in other major international publications of other international organisations. Are these references exhaustive or should additional issues be taken into account?

SI No.	Country/ Organisation	Comments
	Australia	The reference looks adequate. As previously suggested by ABS, mention needs to be made of the fact that changes over the last 25 years in compiling statistics have led to increased use of administrative data, increased awareness of respondent burden, reducing resource base et. These are probably adequately covered already.
	Azerbaijan	No comments
	Botswana	If there are any additional issues, they should be taken into account
	Bulgaria	The references are adequate.
	Canada	The list seems complete enough. As the revised recommendations makes reference to an integrated approach, perhaps making reference to all of the major reference manuals would be helpful. To that end, references to manuals on merchandise trade, price indexes and the measurement of services, and the balance of payments, in other words, situate the recommendations for industrial statistics within the broader statistical framework for the measurement of the whole economy.
	Chile	Other additional issues to be taken into account can be: 1. The necessity to give answer to the growing demand of information about industrial statistics because the incorporation of new topics of investigation like globalization competitiveness and technological innovation 2. Being an aid to the more rapid assimilation of harmonization methodological industrial statistics.
	Costa Rica	No comments
	Czech Republic	No additional references were found.
	Finland	References are exhaustive.
	France	It is o.k.
	Greenland	No comments
	Hong Kong China	References made to relevant changes in concepts, definitions and terminology in other major international publications over the past two decades are considered exhaustive
	Hungary	It would be useful to mention the documents covering Industry statistics used by the

SI No.	Country/ Organisation	Comments
		EUROSTAT (first of all for Short Term Statistics (STS), Structural Business Statistics (SBS) as well as product statistics (PRODCOM).
	Italy	--
	Japan	No comments
	Kenya	Yes but very little has been mentioned as regards the interface between ISIC Rev.3.1 and ISIC Rev.4. As a country we adopted SNA 93 in yr 2004 and just adopted the ISIC Rev.3.1. Mapping of some of these activities is not one-to-one. Though this has been adequately addressed in other quarters, a brief in this area will go along way to add value.
	Lithuania	The references are exhaustive and sufficient.
	Macao China	We consider the references are adequate
	New Zealand	We are not aware of any substantive issues that have been missed.
	Palestine	We think these references are exhaustive
	Philippines	The list is already exhaustive. Factors relevant to Philippines have been covered in the list. We have no further additional issues.
	Poland	--
	Russian Federation	Exhaustive
	Singapore	No comments
	Slovenia	These references are exhaustive enough.
	Sweden	No comments
	Switzerland	--
	ESCWA	--
	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 soon be adopted as well. There exists a handbook on the design and implementation of business surveys.
	OECD	--

2. Chapter I: SCOPE OF INDUSTRIAL STATISTICS

The scope of the industrial activities has been extended to include activities of sewerage (division 37), waste collection, treatment and disposal activities; materials recovery (division 38) and remediation activities and other waste management services (division 39). Do you agree with the extended scope?

Country/ Organisation	Comments
Australia	ABS agrees with this extended scope, and assumes that water supply is also included in this scope.
Azerbaijan	No comments
Botswana	Yes
Bulgaria	NSI agree with the extension of the scope of industrial activities, it is logical consequence of ISIC revision. Section E should be in the scope of Industrial surveys.
Canada	Yes
Chile	We agree with the inclusion of the division 38 and division 39 provided they have a higher level of processing We do not agree with the division 17 because it is a service to society.
Costa Rica	No comments
Czech Republic	According to the ISIC Rev. 4 (and consequently NACE Rev. 2) the divisions 37, 38 and 39 are considered part of Industry. Therefore there is no other option than to agree with the extended scope. However, these divisions are of specific nature and they should be treated in a specific way, especially with regard to the indicators surveyed. With regard to the limited historic data available there are also considerable limits in back casting of the time series.
Finland	Yes
France	Yes, as it is consistent with the new classification ISIC rev.4. But it can seem strange your scope is "industry" and your references for the boundaries of sections are always with "manufacturing" only. Don't you have a definition of "industry" as a whole vs. trade ancillary activities for instance? It comes only later, for outsourcing only, and your description of outsourcing does not include the treatment of the "products".
Greenland	No comments
Hong Kong China	The extended scope is agreed. In Hong Kong, the feasibility of extending the industry coverage of the Annual Survey of Industrial Production to the industry sector of sewerage and waste management is being studied.
Hungary	Generally yes, detailed depending on the individual EUROSTAT Regulations concerning STS, SBS and PRODCOM.
Italy	---
Japan	No comments
Kenya	Yes. We can no longer afford to ignore these areas. This however will be quite a challenge to some of the developing countries where most of these systems are not there/not very well developed. Hence consolidating this kind of data will take time.
Lithuania	Not all countries have waste management and waste water treatment enterprises; therefore, when publishing information on the entire industrial sector (B, C, D, E), this information will not be exhaustive, whereas it is impossible to collect some indicators due to the particularity of enterprises classified under this activity.

Country/ Organisation	Comments
Macao China	Yes
New Zealand	No reason to disagree
Palestine	We think that this is useful, but must take account these changes in the breakdown of economic activities in the area of international comparisons between old and new revision or linkage between various classifications used in the event of the application of these classifications, through make schedules links to these classifications.
Philippines	Construction was classified in the industry sector before the ISIC Rev 4 in 2006.why is it not included in the industry now. In the Philippines and in other developing countries, compilation and monitoring of statistics on sewerage activities and waste management services are not in place. Thus, it will take some time for the country to interface with this expansion of coverage due to lack of data.
Poland	We agree (scope should be consistent with Regulation UE - Short Term Statistics)
Russian Federation	We agree with extended scope.
Singapore	No comments
Slovenia	We do not agree entirely with the extended scope - 38.3 will according to the EU regulation with 2009 be out of scope of short-term industrial statistics.
Sweden	No comments
Switzerland	--
ESCWA	--
Eurostat	Yes, this is in my view a logical consequence of the ISIC revision. It was agreed with the EU Member States to include these activities in the data collection on industry as well.

3. Chapter II: STATISTICAL UNITS

A separate chapter has been added to reflect the different statistical units in the collection of industrial statistics. Do you consider this chapter useful and the coverage of the chapter adequate?

Country/ Organisation	Comments
Australia	ABS considers this chapter useful. ABS has previously made suggestions regarding the need for a statement to the effect that choice of unit will in part be dependent on statistical needs of users and the availability of appropriate lists. Coverage is considered adequate.
Azerbaijan	No comments
Botswana	Yes
Bulgaria	The description of statistical units is useful and coverage of the chapter is adequate. The choice of statistical unit depends on the characteristics that are required and on possibility of the unit to present data. In our case the surveyed statistical unit is enterprise and in some

Country/ Organisation	Comments
	cases data are asked by local units or be kind of activity units of the enterprise.
Canada	Yes
Chile	This chapter is useful because help to establish the most appropriate statistical unit for production and employment data. It would be relevant deep more the analysis of the informal sector because of the complexity of their measurement. Besides lately there are more demands for statistics with territorial desegregation.
Costa Rica	No comments
Czech Republic	We consider this chapter useful and adequate.
Finland	Yes
France	Yes. Replace "mangers" by "managers" in paragraph 2.8.
Greenland	No comments
Hong Kong China	The chapter is useful. In Hong Kong, establishment (i.e. an economic unit which engages, under a single ownership or control, in one or predominantly one kind of economic activity at a single physical location) is the basic unit for data collection. Where separate figures relating to different activities or different locations under the same management are not available, a combined return is accepted and in this case, the reporting unit is treated as an establishment.
Hungary	The chapter is useful and we found the coverage adequate.
Italy	--
Japan	No comments
Kenya	Very useful especially the suggested institutional units as entrenched in the 1993 SNA system
Lithuania	Yes, the chapter is very useful.
Macao China	Yes
New Zealand	This is a very useful chapter, reflecting the thinking that underlies other manuals such as ISIC and ANZSIC 2006.
Palestine	We agree on this topic.
Philippines	We find the chapter extremely useful and it has covered all possible statistical units. The descriptions are thorough. We have no further issue on this chapter.
Poland	We consider that this chapter is useful and the coverage of it adequate.
Russian Federation	Yes. Chapter II Section B. Statistical Units p.24 Distinction between terms is not clear enough and seems uncoordinated in some cases. For example, definitions of "statistical unit" and "reporting unit" look generally alike. It seems reasonable to avoid an ultimate direct definition of statistical units in 2.12 as it was made in some other manuals on the theme (e.g. EU Council Regulation #696/93, article 2). Also there is logical mistake in 2.13: common category "statistical unit" is set out in one line

Country/ Organisation	Comments
	<p>with collection and reporting units which are categories of lower level.</p> <p>Chapter II Section F. 2.72. p.39 Duplication of text in the end of paragraph.</p>
Singapore	Yes
Slovenia	Yes
Sweden	No comments
Switzerland	--
ESCWA	<p>As we understand, the intent of including this chapter in the manual is to identify different kinds of statistical units and help understand their grouping into the institutional units defined in 1993 SNA. This is indeed necessary for developing data collection strategies. But certain inadequacies still persist in the present draft. They are as follows:</p> <p>(i) Paragraphs 2.20 and 2.21 describe the 'household institutional sector', as defined in 1993 SNA and provides the justifications of recognising it as a separate institutional sector. These paragraphs need rewriting to avoid repetition of arguments.</p> <p>(ii) The definitions given in paragraph 2.23 implies “unincorporated household enterprises” are not “Unincorporated enterprises” !! We do not see any justification of introducing another connotation of the term 'unincorporated enterprise' when the term 'quasi corporate' already exists.</p> <p>(iii) The following text of paragraph 2.32: "... On the other hand, the term “unincorporated enterprise” refers to an institutional unit - a household or government unit - only in its capacity as a producer of goods and services for which a complete set of financial accounts including balance sheet is available" is not consistent with paragraphs 3.25 & 3.29.</p> <p>(iv) The following text appears twice in paragraph 2.72: "... Informal activities range, for example, from street vending, shoe shining and other activities that require little or no capital and skills to activities that involve a certain amount of investment or level of skills such as tailoring and car repair."</p> <p>(v) For organising data collection, it is essential to group the enterprises into different categories of enterprise. The intended classification of all enterprises appears to be as indicated below:</p> <ol style="list-style-type: none"> 1. incorporated <ol style="list-style-type: none"> 1.1 corporations 1.2 other incorporated <ol style="list-style-type: none"> 1.2.1 cooperatives 1.2.2 limited liability partnerships 1.2.3 non-profit institutions 2. unincorporated <ol style="list-style-type: none"> 2.1 quasi-corporate (as defined in 1993 SNA) <ol style="list-style-type: none"> 2.1.1 Government owned 2.1.2 owned by non-residents

Country/ Organisation	Comments
	<p>2.1.3 owned by households</p> <p>2.2 household sector (as defined in 1993 SNA)</p> <p>2.2.1 informal sector (defined as per national considerations)</p> <p>2.2.2 other household sector enterprises.</p> <p>This classification (or any other intended classification necessarily constituted of mutually exclusive categories) may be clearly spelt out at an appropriate place in the manual to avoid confusion.</p> <p>(vi) Also may be noted that the description of 'informal sector' might, under certain national considerations, include units defined as quasi-corporate (owned by households), particularly when the criterion of 'non-registration of its employees' is used to define informal sector. That the 15th ICLS recommendation clearly excludes the possibility of an 'informal sector' enterprise falling outside 'household sector' needs to be stated clearly.</p>
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.
OECD	--

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?

Country/ Organisation	Comments
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.
Azerbaijan	No comments
Botswana	Yes
Bulgaria	Yes, the document is usefull.
Canada	Yes
Chile	--
Costa Rica	No comments
Czech Republic	Yes
Finland	Yes
France	Yes, but the relationship between "institutional unit" and "enterprise" is not clear for me in your presentaion, and above all in table and diagram 2.1. For me an "enterprise" is a kind of "institutional unit", or more exactly several kinds but you should list them.
Greenland	No comments
Hong Kong China	The document is useful.

Country/ Organisation	Comments
Hungary	It is useful.
Italy	---
Japan	No comments
Kenya	Yes- I would like to pay particular attention to the treatment of the statistical units of the informal sector which are very prevalent in the developing countries. Most of the jobs are being created from this sector and is also growing very fast. The definitions by ICLS are very good as they ensure comparability nationally and internationally.
Lithuania	Yes, this document is very useful and user-friendly. There is no need to search for a separate document concerning statistical units.
Macao China	Yes
New Zealand	Yes- particularly useful is the relationship between administrative and statistical units.
Palestine	It is a useful document..
Philippines	The document is very useful as it provides a detailed definition, description and listing of all statistical units available.
Poland	We consider that this document is useful.
Russian Federation	Yes
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
Slovenia	Yes
Sweden	No comments
Switzerland	--
ESCWA	Yes, it would be very useful in organising data collection and compilation. Particularly, the treatment of multi-establishment enterprises suggested in the document would help framing instructions for establishment surveys.
Eurostat	It is useful document. As you know, there is a Regulation (696/93) at the 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 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>

Country/ Organisation	Comments
	<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>

4. Chapter III: CHARACTERISTICS OF STATISTICAL UNITS

The description of the characteristics of statistical units in the *IRIS 1983* has been organized and extended in a separate chapter in the *IRIS 2008*. Do you consider this chapter useful and coverage of the chapter adequate ?

Country/ Organisation	Comments
Australia	This is a useful addition to the IRIS. I have only one issue and that relates to Section E. It is not apparent that the very detailed size breakdown should be recommended as a minimum division (see para 3.33) - there is no justification for same. Equally of concern the proposed size groupings including the suggested international reporting groupings have no boundary at 19 ie less than 20 persons which certainly in Australia is the 'small' business definition. Coverage is considered adequate.
Azerbaijan	No comments
Botswana	Yes
Bulgaria	The chapter is usefull and the coverage is adequate.
Canada	Yes
Chile	This chapter is useful but maybe this chapter could be part of the chapter two because is a part of the treatment of the statistical units.
Costa Rica	No comments
Czech Republic	We consider this chapter useful and adequate.
Finland	Yes
France	Yes
Greenland	No comments
Hong Kong	The coverage of the chapter is adequate. Characteristics as mentioned in the draft IRIS, such as

Country/ Organisation	Comments
China	physical address, economic activity, and employment size of establishments have already been included in the Central Register of Establishments, which is the sampling frame for all establishment statistical surveys carried out by the Census and Statistics Department, Hong Kong.
Hungary	The chapter is useful and we found the coverage adequate.
Italy	---
Japan	No comments
Kenya	Yes- The kind of activity recommendations are quite elaborate and also recommendations to develop stability rule as a country very much welcome. This will ensure inconsistencies between infra-annual and annual statistics are avoided. The recommendation on the issue of "size" that is applicable as envisioned in para 3.38 and 3.39 is quite commendable. This will ensure international comparability of data. We propose to apply these characteristics of statistical units while conducting our forthcoming MSE survey 2008.
Lithuania	The chapter is useful and adequate.
Macao China	Yes
New Zealand	Yes
Palestine	That chapter is useful and coverage was adequate and comprehensive.
Philippines	The chapter is very comprehensive. We have no further issues.
Poland	We consider that this chapter is useful and the coverage of it adequate.
Russian Federation	Yes
Singapore	No comments
Slovenia	Yes
Sweden	No comments
Switzerland	--
ESCWA	Yes, it is certainly useful, provided the repetitions and inconsistencies with Chapter II are done away with: (i) Paragraph 3.27 is a repetition of paragraph 2.23 (ii) Paragraph 3.29 is not consistent with paragraph 2.32
Eurostat	The characteristics described are at the EU level more included in the business 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 statistics units and business register after the Xmas holidays.
OECD	Section 3 F: Demographic Characteristics (incidentally this should be 3G not F). This section

Country/ Organisation	Comments
	deals scantily with BD, referring to births and deaths. Given the significant work we've done on establishing definitions in this regard it's a shame that there's no reference to the BD Manual I refer to above, and this should be referred to. I accept that there's some difficulty given the focus in this document on establishment data for industrial statistics more generally and our (the BD Manual's) recommendations for Enterprise based units but it would be better for this document to recognise that, and the difficulties inherent in (a) compiling demography statistics (b) making them comparable and (c) interpreting establishment based demography statistics. Incidentally, whilst we're on the subject of statistical units. Have they received comments from Eurostat yet? As Eurostat collect industrial stats at the enterprise level.

5. Chapter IV: DATA ITEMS AND THEIR DEFINITIONS

- (i) **The data items and their definitions have basically been maintained from the previous recommendation. However, data items have been added and definitions revised to reflect the update of the *1993 System of National Accounts*. Moreover, data items are included to extend the link to the environment and environmental accounting. Do you agree with this extension?**

Country/ Organisation	Comments
Australia	In the context that this is a list of potential data items then I see no issue in including them. It does reinforce the need for the introductory paragraph highlighting the need for NSOs to make judgements as to what data items might be included.
Azerbaijan	No comments
Botswana	Yes
Bulgaria	Yes, we agree with this extension.
Canada	Yes
Chile	Not because include environmental issues in the industrial statistics could go against coverage and could cause delay in delivery of information.
Costa Rica	No comments
Czech Republic	Information related to the environment should probably be treated separately.
Finland	Yes
France	Yes. A bit exhaustive (too long) but o.k. for an ideal statistical world. Paragraph 4.58 ("productive hours"): why mentioning only "trade services"? A definition of "production workers" and "productive hours" should be consistent with the new definition of "manufacturing production" (according to new outsourcing rules) or use the word "fabrication".
Greenland	No comments

Country/ Organisation	Comments
Hong Kong China	<p>Collection of environmental protection expenditure is supported.</p> <p>While the definition of ‘environmental protection expenditure’ has been stated in the draft IRIS (i.e. both current and capital expenditure whose primary purpose is for the prevention, reduction and elimination of pollution as well as any other degradation of the environment), it will be useful if more practical examples and elaboration could be provided for better understanding of the issue. For example, should expense in sponsoring tree planting program be treated as ‘environmental protection expenditure’?</p> <p>It is also noted that for the definition of ‘unpaid family workers’, the definition adopted in IRIS is slightly different from that adopted in IRDTS, i.e. the additional criterion of “<i>Unpaid family workers who at the same time are in paid employment with another unit as their principal occupation should not be considered as employed in the concerned unit</i>” is included in IRDTS but not in IRIS. Consistency between the two publications should preferably be maintained.</p>
Hungary	Yes
Italy	--
Japan	No comments
Kenya	Yes. This will also allow compilation of environmental indicators affecting the industrial sector. The only thing that needs to be expounded is on the frequency of these kind of statistics
Lithuania	Yes, we do.
Macao China	Yes
New Zealand	The extension is a useful one and is timely given the growing profile of environmental accounting. However the collection of some items may have to be balanced by individual agencies against other issues, such as the minimisation of respondent load.
Palestine	Yes. It must be emphasized on the need to achieve consistency and coherence between the concepts and definitions of the recommendations and all standards and international statistical manuals of the various inter-agency task forces.
Philippines	We conform to the recommendation to extend the data links to environmental accounting since the Philippines is also compiling the Environmental Accounts. It allows for a harmonisation and direct linkage between the two accounts.
Poland	In our opinion the definition should be comparable to recommendation of Eurostat. Definition of orders is too short and general and comprises too little information on coverage characteristics.
Russian Federation	Yes
Singapore	No comments
Slovenia	Yes
Sweden	No comments
Switzerland	--
ESCWA	Yes

Country/ Organisation	Comments
Eurostat	<p>It is very ambitious list of data items. It is clear that at EU level most items can not be provided.</p> <p>Definitions for most data items are in line with the Eurostat definitions except for the unpaid family workers: the manual recommends to include all unpaid family workers regardless of how many hours they work for the unit. We have recently included in our definition of unpaid persons employed that they have to work regularly in the unit in order to be included. We did so with an eye on the productivity analysis. What is the reason for including all unpaid family workers?</p> <p>At EU level data on industrial products does not use the CPC classification but a classification that is also based on ISIC (NACE) codes and which is also consistent with the combined nomenclature used for external trade statistics.</p>
OECD	<p>(i) para 4.10 (period of operation) there's a reference to 'in operation since'. This implicitly refers to births and here's a good place where a reference to the BD manual would also be welcome, as without explicit guidance, country stats on this measure will differ significantly...</p> <p>(ii) Para 4.197 makes a glib reference to ICT products. There should be a reference to DSTI's work on this area.</p> <p>(iii) Para 4.205 - there's a reference to DBMS, without a preceding reference to database management systems (i.e the supporting software). Equally, in the sentence: The cost of the DBMS used should not be included in the costs but be treated as a computer software asset unless it is used under an operating lease" they should delete the ambiguous " unless it is used under an operating lease" and replace with 'as appropriate', as readers may misinterpret this as meaning that the costs of the DBMS should be capitalised under databases if acquired under an operating lease, which would be incorrect . The reference in this paragraph to "Long-term license-to-use is also treated as capital" should also be deleted as this relates to software.</p> <p>(iv) Para 4.207 - the section on depreciation will need to be modified to reflect the fact that the next SNA will, as I understand it, refer to consumption of fixed capital and depreciation interchangeably. So this section will need to differentiate between depreciation in a business accounting context and depreciation in an SNA context.</p>

- (ii) **The value of output and the value added have been recommended to be compiled at the basic prices (the prices recorded in business account revenues) as against the producers' prices in the 1983 recommendations (which also include product taxes collected on behalf of the government). Do you agree with the change?**

Country/ Organisation	Comments
Australia	Yes
Azerbaijan	No comments
Botswana	Yes
Bulgaria	We agree with calculation of output and value added at basic prices. This is requirement of

Country/ Organisation	Comments
	National accounts. But according to EU Regulation on SBS value added has to be calculates at factor costs. At the moment nationally production value and value added are calculated at basic prices and at factor costs.
Canada	Yes
Chile	Yes, because in cases with special tax treatment in some areas the use of basic prices allows for a proper comparability
Costa Rica	No comments
Czech Republic	We agree with the change to basic prices concept.
Finland	--
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.
Greenland	No comments
Hong Kong China	We have no particular view on the issue. In Hong Kong, manufacturers are not required to collect any taxes on behalf of the government. Therefore, the two concepts are essentially equivalent in Hong Kong.
Hungary	Yes
Italy	--
Japan	No comments
Kenya	Yes. As a country , we have adopted valuation at basic prices in line with the SNA 93 recommendations
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 (taxes are different across countries and have a different impact on the value added).
Macao China	Yes
New Zealand	No comment
Palestine	Yes
Philippines	Operationally, this will be difficult to implement since in existing establishment surveys in the Philippines, gross output is valued at producer's prices. It will take time and additional resources to redesign the questionnaire and educate the enumerators and respondents.
Poland	Yes, it does.
Russian Federation	We believe that the cost of production should be accounted in the base price.
Singapore	Yes

Country/ Organisation	Comments
Slovenia	Yes
Sweden	No comments
Switzerland	--
ESCWA	Yes
Eurostat	For value added the factor cost concept is used at the EU level as this is more close to business accounts concepts (subsidies and taxes are indeed difficult to single out in company accounts).
OECD	--

(iii) Is the industrial enquiry the appropriate data collection instrument for the collection of waste water and use of water and energy products or should these data be collected in special purpose enquiries?

Country/ Organisation	Comments
Australia	ABS experience has been that water, and environmental expenditure data may not be suitable for collection with other financial data.
Azerbaijan	No comments
Botswana	They should be collected in a special enquiry from the same establishments covered by the industrial enquiry to avoid congesting the industrial enquiry with many items collected at the same time and thus making the industrial enquiry user-unfriendly.
Bulgaria	It is better to collect this information with special inquiry.
Canada	Maybe. This is best left to the discretion of the NSO as they must balance the ability of firms to report with data requirements. At STC, there are separate enquiries associated with these collections which form part of the environmental statistics program.
Chile	Yes it is the appropriate data collection instrument.
Costa Rica	No comments
Czech Republic	These specific data should be a subject of special enquiries.
Finland	This is problematic for Finland. The variable Total water used can not be currently compiled by Statistics Finland. Also data on environmental protection expenditures can be only produced at 2-digit level.
France	Why not in the industrial enquiry, but countries that could know the sales of the big enterprises by customers (with kind of activity unit, location) would be more efficient. Alternative data collections should be presented.
Greenland	No comments

Country/ Organisation	Comments
Hong Kong China	At present, we collect fuel, electricity and water expenses through our Annual Survey of Industrial Production. Nevertheless, the quantities of water, electricity and other energy products consumed during production are not collected as such information usually is not kept in the respondents' accounting systems.
Hungary	These data should be collected in special purpose enquiries.
Italy	--
Japan	No comments
Kenya	From the viewpoint of the industrial sector, yes. Its more practical to get this kind of data from the industrial enquiry to measure the effects of an industry towards environmental protection.
Lithuania	Some part of statistical information may be collected using these recommendations; however, some part cannot. These are specific activities, and they may be applied specific requirements.
Macao China	Number of statistical units engaging in collection of waste water and use of water and energy products are very limited therefore; incorporating these activities in the industrial enquiry may maximize resources needed to conduct another special purpose enquiry.
New Zealand	No firm view.
Palestine	No comment.
Philippines	It is just one approach that can be used. Special purpose surveys should be done to supplement the above enquiries.
Russian Federation	Should be collected in special purpose enquiries
Poland	These date should be collected in special purpose enquiries.
Singapore	No comments
Slovenia	We recommend the special purpose enquiries.
Sweden	No comments
Switzerland	--
ESCWA	Attempts should be made. Countries should carry out pilot tests before incorporating these items in the final questionnaire.
Eurostat	At the EU level this data is collected in the framework of other statistical regulations and most likely also by different enquiries. We have a feeling that including issues that are not directly linked to the company accounts (quantitative information on energy and water) do not give that good results if included in the structural survey.
OECD	--

- (iv) 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/ Organisation	Comments
Australia	Please refer to the comments for section three
Azerbaijan	No comments
Botswana	No comments
Bulgaria	Yes the document is usefull. The list of characteristics required with EU Regulation on Structural business statistics is much more limited than the list list contained in the draft international recommendations.
Canada	Yes
Chile	--
Costa Rica	No comments
Czech Republic	Yes
Finland	Yes
France	Yes, certainly for developing countries and even for developed countries at it reviews an exhaustive list of issues, but the practical conventions in each national level or at the European level will certainly differ (above all for employment data and hours worked)
Greenland	No comments
Hong Kong China	The document is useful.
Hungary	The document is useful.
Italy	--
Japan	No comments
Kenya	Very useful. The level of detail is fairly representative
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	Yes, with the proviso that this be seen as a resource rather than as a prescriptive set of items that must be collected. Some items are of greater importance than others to end users, and there are also differences in the ability of respondents to provide some of the items mentioned.
Palestine	The document is useful and coverage is adequate and comprehensive. The need to make Arabic-language copies of new classifications revisions, and circulated to the Member States, to adopt them in accomplishing national classifications of each State.
Philippines	We consider the document useful specially in redesigning of existing establishment questionnaires and in designing new data collection instruments.

Country/ Organisation	Comments
Poland	We consider that this chapter is useful.
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.
Slovenia	Yes
Sweden	No comments
Switzerland	--
ESCWA	<p>It is an essential part of the manual, providing a list of estimates to be generated from industrial enquiries.</p> <p>What is missing is the number of workers employed on job contract who are not on payroll. The treatment for the payment made to workers on job contract and not on payroll also needs to be specified. Such payments ought to be treated as compensation of employees rather than service charges. [This point was mentioned in our earlier comments. Whether it was considered for the present draft is not clear.]</p>
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"> 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). 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 reflects current economic structures and not past ones. 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.

Country/ Organisation	Comments
	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.

6. Chapter V: PERFORMANCE INDICATORS

This is a new chapter. Do you consider this chapter useful and the coverage of the chapter adequate?

Country/ Organisation	Comments
Australia	The ABS considers the chapter useful. ABS had some reservations regarding the recommended minimum program. These have in part been addressed in the latest version. ABS considers that operating profit margin or something similar, would be a useful additional indicator.
Azerbaijan	No comments
Botswana	The chapter is very useful. However, as I have mentioned before, the chapter could have been more useful if the definitions were accompanied by examples.
Bulgaria	Yes it is usefull.
Canada	Yes, but it could be improved by adding some concentration ratios and perhaps by adding some of the Globalization Indicators proposed by the OECD manual on Globalization.
Chile	This chapter is useful, and we believe that it would be good to expand the section C describing in greater detail the types of indicators.
Costa Rica	No comments
Czech Republic	Although it brings mainly information of elementary nature, we consider this chapter useful and adequate.
Finland	Yes
France	Yes
Greenland	No comments
Hong Kong China	The chapter is useful. Performance indicator is useful for both macro economic analysis, and as a benchmarking indicator for reference by various companies in the industry sector concerned to evaluate its own performance against the industry average.
Hungary	The chapter is useful and we found the coverage adequate.
Italy	--
Japan	No comments
Kenya	Chapter very useful and coverage adequate

Country/ Organisation	Comments
Lithuania	The coverage of performance indicators could be broader. In practice, more indicators defining activities are used.
Macao China	Yes
New Zealand	Yes, subject to respondent load issues mentioned above.
Palestine	Yes. Preferably holding workshops to introduce this chapter and discussed by the specialists concerned in the subject.
Philippines	This chapter is very useful. Performance indicators should include the contribution to growth of various industries to total economy. This is an important chapter to heighten awareness regarding the use of industrial statistics. We have been preparing and using some of these indicators to analyse and validate our national accounts. Some of the data needed to develop some performance indicators have yet to be included in our establishment surveys such as the Number of Orders received and Unfilled Orders at the end of enquiry period.
Poland	We consider that this chapter is useful and the coverage of it adequate.
Russian Federation	Yes
Singapore	No comments
Slovenia	Yes
Sweden	No comments
Switzerland	--
ESCWA	Yes
Eurostat	It is useful.
OECD	<p>(i) I think we should encourage UNSD to include some caveats here. Industrial statistics are fraught with difficulties when making comparisons over time, reflecting measurement, and classification problems. We should refer them to the inventory of caveats we describe in our Structural and Demographic Business Statistics publication, and indeed encourage them to copy sections of this publication into their document - including the sections that deal with SBS vs NA comparisons.</p> <p>(ii) An inclusion of the very recent and highly relevant work on linking business statistics to international trade statistics should be included since it allows the “bridging” between two very different conceptual frameworks. Work is well underway in this area at OECD and Eurostat and attracts increasing attention from users.</p>

7. 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 to help implement the international recommendations on industrial statistics.

Do you consider this chapter useful and the coverage of the chapter adequate?

Country/ Organisation	Comments
Australia	Again this is a useful addition to the IRIS. As ABS has previously noted: 'A minor point but I disagree with the assertion in 6.9 that respondents are likely to report more accurately to the statistical agency than the administrative agency. I would suggest that at best they will be equal quality ie they will report the same or the administrative data will be of higher quality as the penalties are invariably much higher.'
Azerbaijan	No comments
Botswana	Real life examples should be included in the Imputations section to show how the different imputation methods could be applied. The same thing applies to the section on Grossing up Procedures and Aggregation.
Bulgaria	The chapter is usefull it provides usefull inormation for setting up data collection system and to choose data sources and compilation methodology.
Canada	Yes
Chile	This chapter is useful because it not only describes the data sources, but also explains the pros and cons of their use. Another important point in the chapter are the methods of compilation It would be important to broaden the chapter with recommendations of method of compilation ranked in order of importance for potential cases.
Costa Rica	No comments
Czech Republic	We consider this chapter useful and adequate.
Finland	Yes
France	Yes. The practical case of "Dun & Brastreet" could be developed if the manual is to provide in the broad sense.
Greenland	No comments
Hong Kong China	The chapter is useful. It provides a comprehensive framework on major data sources for collecting industrial production statistics, and outlines some key issues to note during data editing, imputation and grossing up procedures.
Hungary	The chapter is useful and we found the coverage adequate.
Italy	--
Japan	No comments

Country/ Organisation	Comments
Kenya	I find the chapter an eye opener. We are currently implementing the National Statistical System; we have included all data providers while at the same time trying to address some of the shortcomings like risks, delays and even the aspect of legal constraints. We are also in the consultative process of coming up with acceptable reporting formats. In terms of compilation methods insights into imputations, gross up processes and aggregation very resourceful.
Lithuania	The chapter is very useful, whereas it provides possibilities for the reduction of statistical response burden. The chapter could be supplemented with one more data source – direct data extraction from the business system of enterprises. It is a novelty; however, some countries apply this method. Recommendations are prepared for a longer period; therefore, in the nearest future, this method may become a wide-used one. In Part 6.25, errors appearing due to the quality of a questionnaire are mentioned. Having prepared a questionnaire, it has to be tested. This issue should be mentioned.
Macao China	Yes
New Zealand	Yes. It should however be recognised that not all of the benefits of administrative data will necessarily apply in all economies. For example: (a) Cheaper for the statistical office to acquire. The cost savings from using administrative data should not be overstated. Data may be cheaper to acquire, but the costs of processing administrative data can be quite high. Administrative data should not be seen as way of reducing costs. (b) Negligible non-response Depending on administrative processes, missing records can be a problem. (c) Data reported may be more accurate. This is not always the case. Even when the administrative authority checks data, they focus on the variables that are material to their administrative processes. They may not apply the same level of scrutiny to variables that are of statistical interest.
Palestine	Yes. Preferably holding workshops to introduce this chapter and discussed by the specialists concerned in the subject.
Philippines	The discussion on survey vs. admin-based data system very useful for those countries who are planning to consider alternative approaches in data collection. The section on imputation is one thing we highly appreciate.
Poland	Yes, it does. It gives basic information about data sources and data compilation methods.
Russian Federation	Yes
Singapore	No comments
Slovenia	Yes
Sweden	No comments
Switzerland	--
ESCWA	Yes

Country/ Organisation	Comments
Eurostat	This chapter is useful as a guideline. The situation and practical implementation can however, differ considerably across countries.

8. Chapter VII: DATA COLLECTION STRATEGY

This is a new chapter discussing data collection strategy for industrial statistics 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/ Organisation	Comments
Australia	The chapter is useful and the coverage adequate.
Azerbaijan	No comments
Botswana	It is useful as well. We welcome the suggestion that an abbreviated version of an enquiry may be used for small establishments as this would help in improving response for the enquiries. However, to cater for this recommendation, the IRIS 2008 should include a section in Chapter VI(Data compilation methods) that show how the variables that were left out in the small establishments enquiry could be imputed and added to those of large establishments. The IRIS should also suggest the data items that could be left out . It will also be helpful if the IRIS could include examples of enquiries for large and small establishments
Bulgaria	Yes, the chapter is very useful and coverage is adequate.
Canada	Yes
Chile	The chapter is important especially on the part of coverage and maintenance of the Business Register because it is vital to a good approximation of the industrial sector since this is a very dynamic sector which makes this register lose its value quickly in time. Business Register must be flexible to the entry and exit of firms.
Costa Rica	No comments
Czech Republic	We consider this chapter useful and adequate.
Finland	Yes
France	Yes
Greenland	No comments
Hong Kong China	The chapter is useful.

Country/ Organisation	Comments
Hungary	The chapter is useful and we found the coverage adequate.
Italy	---
Japan	No comments
Kenya	Very useful. This is especially with the integrated approach to cover all production units across all class, sizes including micro & small enterprises. The biggest challenge for developing countries still remains since the register of unincorporated enterprises in most cases does not exist. The recommended data collection strategy for the different segments of the economy is quite exhaustive and also implementable.
Lithuania	Yes, the chapter is useful, and the coverage is adequate. We have a comment on Part 7.1: Information can be obtained not only through a sample surveys, but also through a statistical survey.
Macao China	Yes
New Zealand	Very useful, particularly in regard to the purpose and maintenance of business registers.
Palestine	Yes. Preferably holding workshops to introduce this chapter and discussed by the specialists concerned in the subject.
Philippines	We find the discussion in most of the sections in this chapter sufficient. However, the discussion in Section – E Reconciling the results of annual benchmark surveys with infra-annual surveys should be further elaborated particularly the statistical techniques to address this concern. It would be useful to discuss advantages and disadvantages of these techniques. An Annex may be needed for this purpose.
Poland	We consider that this chapter is useful and the coverage of it adequate.
Russian Federation	Yes
Singapore	No comments
Slovenia	Yes
Sweden	No comments
Switzerland	--
ESCWA	<p>Yes. Only, two changes are suggested in paragraph 7.46 :</p> <p>(i) In the first sentence, "... noted that an enterprise that is a partnership ..." may be replaced by "... noted that a partnership enterprise without a fixed premises ...".</p> <p>(ii) The sentence: "One such rule, adopted for surveys on establishments of the unorganized sector in India, is to list a partnership concern only against the household of the senior most (by age) partner." may be revised as: "One such rule, adopted for surveys on establishments of the unorganized sector in India, is to list a partnership concern only against the household of the partner who takes major decisions for</p>

Country/ Organisation	Comments
	running the enterprise. The criterion of 'senior most partner', used in earlier surveys, has been replaced by the criterion 'major decision taking partner' in the recent surveys conducted in India (like the survey on services sector conducted in 57 th round (2001-02).
Eurostat	It is useful.

9. Chapter VIII: DATA QUALITY AND METADATA

This is a new chapter discussing data quality and metadata relating to the industrial statistics.

Do you consider this chapter useful and the coverage of the chapter adequate?

Country/ Organisation	Comments
Australia	The chapter is useful.
Azerbaijan	No comments
Botswana	Yes
Bulgaria	The chapter discussing data quality and metadata is very useful and adequate.
Canada	Yes
Chile	This chapter is important because a process of standardization needs standards of quality. It is important to mention that the transparency and integrity of teamwork is essential and must develop a culture of quality that must be related to the principles of unity producing statistics. There is no point in approaching the objectives towards better quality if a department fails in this goal.
Costa Rica	No comments
Czech Republic	We consider this chapter useful and adequate.
Finland	Yes
France	Yes. You mention 6 components of quality in the European Statistical System, but in fact there are some variants around 7, with the addition of "completeness" or "burden cost".
Greenland	No comments
Hong Kong China	The chapter provides a comprehensive review on quality assurance for compiling statistics.
Hungary	The chapter is useful and we found the coverage adequate.
Italy	--
Japan	No comments

Country/ Organisation	Comments
Kenya	This will enhance assessment of national practises against internationally accepted statistical approaches for quality measurement and requisite methodological soundness.
Lithuania	All information on revisions should be presented in this part, not in Chapter IX. In Chapter VIII, only a part of information on revisions is provided, while more detailed information is presented in Chapter IX.
Macao China	Yes
New Zealand	A very useful chapter and a good resource for statistical agencies to use in benchmarking their performance in the various quality dimensions.
Palestine	Yes. Preferably holding workshops to introduce this chapter and discussed by the specialists concerned in the subject.
Philippines	We find the discussion sufficient. However, it would be useful to provide some examples of the indicators mentioned in paragraph 8.11.
Poland	We consider that this chapter is useful and the coverage of it adequate.
Russian Federation	Yes
Singapore	No comments
Slovenia	Yes
Sweden	No comments
Switzerland	--
ESCWA	--
Eurostat	It is useful.

10. Chapter IX: DISSEMINATION OF INDUSTRIAL STATISTICS

This is a new chapter added to provide guidance and recommendations on the dissemination of industrial 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 quarterly dissemination variables identified for international reporting?

Country/ Organisation	Comments
Australia	To the extent that ABS would not or would have significant difficulty in providing even estimates for some of the data items it is difficult to agree that these data represent a minimum list of items.

Country/ Organisation	Comments
	<p>Specific items of concern include:</p> <p><u>Annual</u></p> <p>a) environmental protection expenditure - currently produced less than annual using a different collection vehicle</p> <p>b) total water used - currently produced less than annual on the use side</p> <p>c) total energy consumed - produced less than annual from the use side.</p> <p>d) total water used - produced less than annual from the use side.a</p> <p><u>Quarterly</u></p> <p>a) new orders - not collected by ABS</p> <p>b) unfilled orders - not collected by ABS</p>
Azerbaijan	No comments
Botswana	Yes
Bulgaria	<p>In general we agree with the list of indicators.</p> <p>Indicator 'New orders received' is part of short term statistics system and it is disseminated only in form of indexes.</p> <p>Indicator 'Unfilled orders' is not collected.</p>
Canada	Yes
Chile	<p>We agree on part of the list of data items on industrial statistics with annual periodicity and quarterly periodicity.</p> <p>We disagree with the part of the environment</p> <p>We have no indicators of orders that seem interesting not suited to the structure of the domestic industry.</p>
Costa Rica	No comments
Czech Republic	<p>Quarterly dissemination variables - We agree with the list. However, we would like to notice that "Unfilled orders" are not required by the EU legislation. At the moment CZSO is able to supply this data but it can be the subject of future reduction.</p>
Finland	Yes
France	--
Greenland	No comments
Hong Kong China	<p>While the list of dissemination variables is generally agreeable, it is suggested that the list should be regarded as a 'recommended' list rather than a 'minimum' list of data items for dissemination. The dissemination of detailed breakdowns is subject to data precision and confidentiality. Also, a number of data items on environmental protection, such as quantities of water used and quantities of total energy consumed, may not be easy to collect through statistical surveys.</p>
Hungary	We agree.
Italy	--
Japan	No comments
Kenya	<p>Proposed list of data items for dissemination with annual periodicity looks tenable though data on environment still a challenge to many countries(M). Regarding the quarterly periodicity, this is a move in the right direction but might not be easy for developing countries in the near future</p>

Country/ Organisation	Comments
Lithuania	We suppose that not all countries used information on variable 12.2 "Unfilled orders". Other proposed variables are supported.
Macao China	Agree with the annual dissemination variables identified for international reporting, however, we consider that the feasibility and operationalisation of such practice have to depend on the resources and capacity of the NSO or government agencies concerned.
New Zealand	A useful chapter. Once again the minimum reporting standards and time lags need to be seen in the context of targets to aim for and balanced off against other considerations, rather than prescriptions that must be met.
Palestine	Yes. The transition from the use of the current classifications revisions to the new classifications entail financial and technical requirements must be taken into account by the Statistical Commission. The revision process should be carried out in close consultation with the official statistical office, in order to fully reflect the specific needs and circumstances and the needs of countries. The level of detail required for reports at the international level should be consistent with the needs of the countries and their ability to compile data.
Philippines	It might be useful to include a paragraph or section of revision policy. This is what we have done for our national accounts and we are presently encouraging our statistical agencies to adopt a revision policy for the statistics they are generating.
Poland	We agree with the list of annual and quarterly dissemination variables.
Russian Federation	Yes
Singapore	No comments
Slovenia	We are already reporting the data according to the EU regulation, some on the monthly basis, the other quarterly or yearly.
Sweden	No comments
Switzerland	--
ESCWA	--
Eurostat	The EU Member States will not be in a position, based on 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 investment in tangible goods). Information on the total energy consumed and the total water used is published by other Eurostat unit but not at the detailed level as required in the manual.

Part III. Other specific comments

Country/ Organisation	Comments
Botswana	Maybe the recommendation needs to include a chapter that shows the difference in the statistics produced under industrial statistics and national accounts.