

**19<sup>th</sup> Meeting of the Advisory Expert Group on National Accounts,  
20, 26 April and 10 May 2022, Remote Meeting**

**Agenda item: 12**

**IE.1 Statistical Framework for the Informal Economy  
Outcome of Global Consultation**

The guidance note IE.1 Statistical Framework for the Informal Economy completed its global consultation in early March 2022. A total of 56 experts representing 50 economies responded.

Respondents largely agreed to the recommendations in the guidance note, and the Task Team believes that no changes to the recommendations are required.

However, the guidance note itself requires additional clarifications and a more prominent discussion on the scope, the delineation from the non-observed economy. It also needs to clarify the relationship between production and informal labour inputs in the formal sector.

The global consultation also revealed the necessity to draft a supplementary note on practical recommendations on the compilation of statistics for the framework as a prerequisite for early implementation of the conceptual framework. However, the practical guidance will not affect the conceptual recommendations in the guidance note.

Therefore, the Informal Economy Task Team seeks final endorsement for publication.

**Questions to the AEG:**

1. Do you agree with the proposed framework for the informal economy?
2. Do you agree that dependent contractors should be classified as owner-operators of unincorporated household enterprises?
3. Do you agree that type a) illegal activities should be excluded from the informal economy by convention and that statistics on informality should be supplemented with measures of type a) illegal productive activities?
4. Do you have any other comments on the guidance note?

## Report on the global consultation of IE.1 Statistical Framework for the Informal Economy

### Summary and Actions

A total of 56 respondents (from 50 economies and international organizations<sup>1</sup>) participated in the global consultation. Responses most concerned National Accounts (48), followed by labour statistics (16) and external sector statistics (11).

The topic is deemed relevant by most respondents and respondents largely agree with all recommendations in the guidance note.

It is noteworthy that developed countries in particular assign a lower priority to the guidance, even though most changes of the framework, compared to the current concepts on informality (informal sector and informal employment) will be relevant to both developing and developed countries.

Of note are comments made by multiple respondents that indicate that the scope and purpose of the guidance note is not clearly understood. The two most critical misunderstandings are 1) that analysing informality is only an effort to achieve exhaustive measures of production and 2) that the guidance note recommends a change to the SNA production boundary.

In addition, a recurring comment is the expected complexity of compiling data for the complete framework. The note should more prominently mention that not all countries may have a policy need to compile data on all dimensions of the framework.

These issues will be addressed through additional paragraphs in the introduction of the guidance note.

Some respondents misunderstood how the framework describes informality in the formal sector specifically the relationship of informal labour inputs and the default formal production. Respondents incorrectly assume that the value or cost of the informal labour inputs would be considered informal production. Related to this issue is the assumption that a concept of the *formal economy* is implied and that the sum of the informal economy and the formal economy is the *economy*. The informal economy can, however, not be expressed by production alone as informality in the formal sector is restricted to informal labour inputs. This should be more clearly emphasized in the section on the formal sector.

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<sup>1</sup> Afghanistan; Armenia; Aruba; Australia; Belarus; Belgium; Bolivia; Brazil; Burkina Faso; China; Cook Islands; Costa Rica; Djibouti; Egypt; Finland; Georgia; Germany; Indonesia; Italy; Japan; Kyrgyzstan; Latvia; Lesotho; Lithuania; Mexico; Montserrat; Morocco; Myanmar; Netherlands; State of Palestine; Peru; Poland; Portugal; Qatar; Republic of Kazakhstan; Republic of Moldova; Romania; Russian Federation; Saudi Arabia; Singapore; Slovak republic; Slovenia; Spain; Suriname; Tajikistan; Turkey; Ukraine; United Kingdom; Uzbekistan; ILO

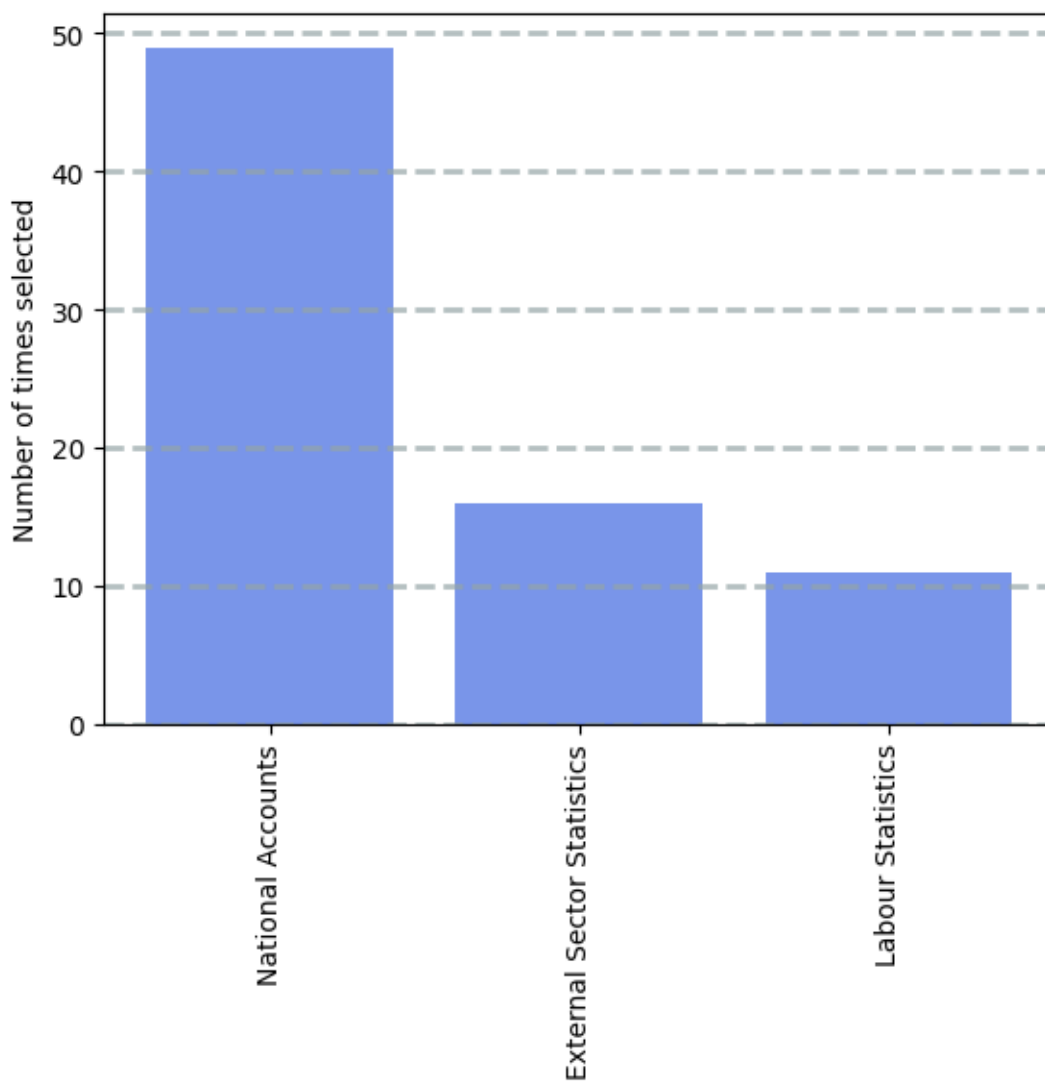
The global consultation also revealed the necessity to draft a supplementary note on practical recommendations on the compilation of statistics for the framework as a prerequisite for early implementation of the conceptual framework.

## Responses

A total of 56 respondents contributed to this consultation, 36 of which agreed to the publication of their verbatim responses which are provided below. The figures reflect the answer of all 56 respondents.

### 1. Your response concerns which area of statistics?

#### 1. National Accounts 2. External Sector Statistics 3. Labour Statistics



**Afghanistan (National Statistics and Information Authority):** National Accounts

**Ukraine (State Statistics Service of Ukraine):** National Accounts

**Turkey (Turkish Statistical Institute):** National Accounts

**Montserrat (Statistics Department Montserrat):** National Accounts; External Sector Statistics; Labour Statistics

**China (National Bureau of Statistics):** National Accounts

**Aruba (CBS):** National Accounts

**Institut National de la Statistique (Institut National de la Statistique):** National Accounts

**Таджикистан (Агентство по статистике при Президенте Республики Таджикистан) Tajikistan (Statistics Agency under the President of Republic of Tajikistan):** National Accounts

**Qatar (Planning and Statistics Authority):** National Accounts

**Portugal (Statistics Portugal):** National Accounts

**Palestine (Palestinian central bureau of statistics):** National Accounts

**Egypt (The Central Agency of Public Mobilization and Statistics):** National Accounts

**Michael Frosch:** Labour Statistics

**Indonesia (BPS - Ejih Tasriah):** National Accounts

**Romania (National Institute of Statistics/ National Bank of Romania):** National Accounts; External Sector Statistics

**Lithuania (Statistics Lithuania):** National Accounts

**Georgia (National Statistics Office of Georgia):** National Accounts

**Costa Rica (Banco Central de Costa Rica):** National Accounts; External Sector Statistics; Labour Statistics

**Indonesia (BPS - Anisa Nuraini):** National Accounts

**Poland (Statistics Poland):** National Accounts; Labour Statistics

**Morocco (High commission for planning):** National Accounts

**ITALY (ISTAT/NATIONAL ACCOUNTS DIRECTORATE):** National Accounts

**Armenia (Central Bank of Armenia):** National Accounts

**Singapore (Singapore Department of Statistics):** National Accounts; External Sector Statistics; Labour Statistics

**Finland (Statistics Finland):** National Accounts; External Sector Statistics

**Germany (Destatis (Federal Statistical Office) / Deutsche Bundesbank):** National Accounts; External Sector Statistics

**Uzbekistan (Central bank UZB):** External Sector Statistics

**Netherlands (Statistics Netherlands, also on behalf of the Dutch Central Bank):** National Accounts; External Sector Statistics; Labour Statistics

**SPAIN (INE - STATISTICAL OFFICE and BANK OF SPAIN):** National Accounts; External Sector Statistics

**BRAZIL (IBGE - INSTITUTO BRASILEIRO DE GEOGRAFIA E ESTATÍSTICA):** National Accounts

**Mexico (INEGI):** National Accounts

**United Kingdom (UK Statistics Authority):** National Accounts; External Sector Statistics; Labour Statistics

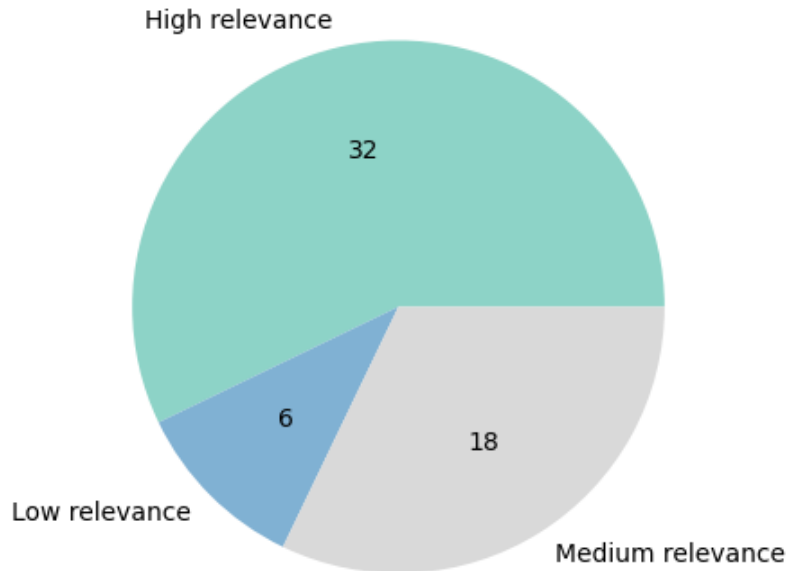
**Latvia (Central Statistical Bureau of Latvia):** National Accounts

**Perú (Instituto Nacional de Estadística e Informática):** National Accounts

**Georgia (National Statistics Office of Georgia - Geostat):** External Sector Statistics

**Belgium (National Bank of Belgium):** National Accounts; External Sector Statistics; Labour Statistics

2A. Is this topic of relevance for your country? 2B. Please elaborate



**Afghanistan (National Statistics and Information Authority):** High relevance  
NSIA tried several times to measure Afghanistan's informal sector. Measuring informality has become very important for Afghanistan as the crisis has hit our economy hard.

**Ukraine (State Statistics Service of ukraine):** Medium relevance

**Turkey (Turkish Statistical Institute):** Medium relevance  
Specific guidance to estimate or definite definitions for informal economy is not given in SNA 2008. In the perspective of National accounts informal economy is manly the subject of Non Observed Economy. So this framework is necessary for concrete definition and concepts for informal economy. If this estimation is delaminated in the updated SNA the tabulation of the results may be presented in the sector classification as in the detail for formal sector and informal sector. Informal economy may be identified in existing classifications and accounts.

**Montserrat (Statistics Department Montserrat):** High relevance  
Yes the topic is relevant, however Montserrat currently does not measure the informal economy

**China (National Bureau of Statistics):** Medium relevance

**Aruba (CBS):** High relevance

**Institut National de la Statistique (Institut National de la Statistique):** High relevance

**Таджикистан (Агентство по статистике при Президенте Республики Таджикистан) Tajikistan (Statistics Agency under the President of Republic of Tajikistan):** High relevance

**Qatar (Planning and Statistics Authority):** Medium relevance  
Informal Economy is considered to be relatively small in Qatar.

**Portugal (Statistics Portugal):** Low relevance

We are aware that definitions are not always clear and consistent and it is important to improve that. But we think that the status quo is good enough. And we are afraid that some degree of precision, classification and details proposed became unrealistic from statistical/data sources point of view...

*IETT: The purpose of the guidance note is to provide a framework for statistics on informality both from a labour statistics as well as a macroeconomic statistics perspective. The framework aims to be conceptually comprehensive. While the Task Team acknowledges that some aspects of the framework may not be relevant in some countries from a policy perspective or not feasible, a comprehensive framework remains necessary.*

**Palestine (Palestinian central bureau of statistics):** High relevance

**Egypt (The Central Agency of Public Mobilization and Statistics):** High relevance  
It is high relevance to enable us from accurate estimating of the National Accounts/Macroeconomic variables for national economic planning.

**Michael Frosch:** High relevance

**Indonesia (BPS - Ejih Tasriah):** High relevance

BPS Statistics Indonesia have compiled Informal Economy (employment and share to GDP) in 2009 and published in 2010 with assistance from ADB. At that time there is a plan to expand the scope of labor force survey to include characteristics of informal economy, but it was not yet realized.

**Romania (National Institute of Statistics/ National Bank of Romania):** Medium relevance

NIS: Within the framework of ESA 2010 and the non-exhaustiveness adjustments types established at EU level, the informal sector is not defined as such, but only components of it.  
BNR: For BOP perspective NBR is interested in recording cross-border illegal activities and other unregistered formal or informal flows performed by residents in relation to nonresidents.

In case of Romania, illegal activities data are estimated by NIS – National Accounts division.

**Lithuania (Statistics Lithuania):** Medium relevance

**Georgia (National Statistics Office of Georgia):** Medium relevance

**Costa Rica (Banco Central de Costa Rica):** High relevance

**Indonesia (BPS - Anisa Nuraini):** High relevance

As a middle-income country, Indonesia comprises productive activities by many unregistered institutional units for tax or permit or similar purposes. This originates mainly from large number of unincorporated enterprises within household ranging from agriculture, manufacturing, and services. Even substantial number of micro scale enterprises have not included in the government registration yet.

This contributes to vast informal sectors within the economy. From the experience of 1998 AFC (Asian Financial Crisis), these unregistered economic units had survived the nation economy by providing safety bumper of the formal sectors collapse.

In order having more accurate calculation for GDP and other macroeconomic statistics, then it is important to record the informal activity accurately within framework standard and for international comparability alignment.

**Poland (Statistics Poland):** Low relevance

From our point of view here is no need to extend this part of statistics, since majority of informal economy is covered by non-observed exhaustiveness types (N1-N7). The additional breakdowns and further granularity may hamper the quality of National Accounts Statistics. The work on the informal economy is not a priority for us at this time.

*IETT: The guidance note does not aim to replace guidance on exhaustiveness.*

**Morocco (High commission for planning):** High relevance

as a developing country; the informal economy is an important part of our economy

**ITALY (ISTAT/NATIONAL ACCOUNTS DIRECTORATE):** Medium relevance

**Armenia (Central Bank of Armenia):** High relevance

Because of relatively high share of agricultural sector (11.1%), trade (11.2%) and construction (6.5%) in GDP. I would like to underline the high proportion of construction financing by households (1/3) in the whole construction sector.

**Singapore (Singapore Department of Statistics):** Medium relevance

For National Accounts and External Sector Statistics, we view that the statistical framework for the informal economy is of "medium relevance" since statistics on the informal sector are incorporated in the national accounts estimates. Further, this indication reflects the comprehensive coverage of Singapore's macroeconomic statistics.

As for labour statistics, Singapore is a highly formalised economy where vast majority of workers are afforded regulatory oversight and employment protection by comprehensive labour laws and regulation. Thus, Singapore does not produce labour statistics on the informal economy.



**Finland (Statistics Finland):** Low relevance

**Germany (Destatis (Federal Statistical Office) / Deutsche Bundesbank):** Low relevance

The assessment reflects the presumably relatively low importance of the informal economy in Germany. The idea that certain production activities and employment are only possible in the informal sector, and that the informal sector thus secures employment in significant numbers, is unlikely in Germany. Hence, the policy needs for a statistical framework are relatively small.

**Uzbekistan (Central bank UZB):** Medium relevance

**Netherlands (Statistics Netherlands, also on behalf of the Dutch Central Bank):**

Medium relevance

The informal sector is relatively small in the Netherlands.

**SPAIN (INE - STATISTICAL OFFICE and BANK OF SPAIN):** Medium relevance

**BRAZIL (IBGE - INSTITUTO BRASILEIRO DE GEOGRAFIA E ESTATÍSTICA):** High relevance

We had two surveys on the informal economy in 1997 and 2003. Subsequently, with the improvement of household statistics, we started to publish, on a quarterly basis, various national data on the informal labor market. We often try to implement ILO recommendations on informality, updating questionnaires and manuals whenever possible. However, since 2003 Brazil has only had labor statistics to estimate informality. In terms of labor input, about 40% of employment in Brazil, in 2021, was considered informal according to the Continuous National Household Sample Survey (Pnad).

**Mexico (INEGI):** High relevance

Given the size (around 22%) of the informal sector and employment in the Mexican economy.

**United Kingdom (UK Statistics Authority):** Medium relevance

**Latvia (Central Statistical Bureau of Latvia):** High relevance

Informal economy still constitute significant share of GDP.

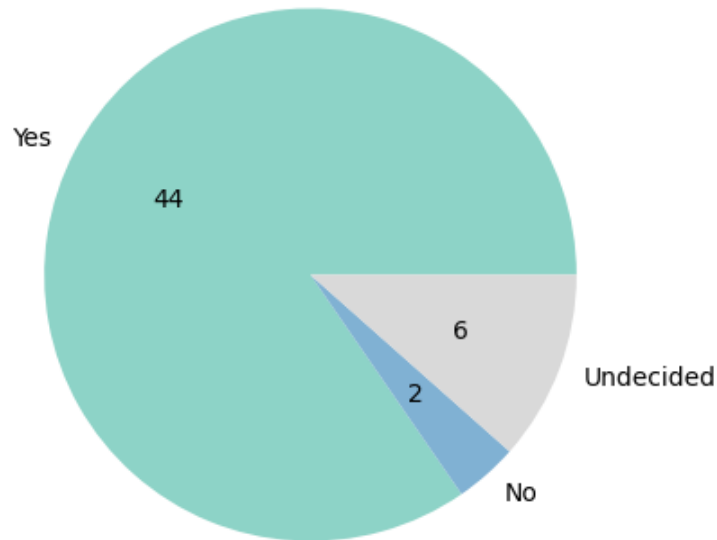
**Perú (Instituto Nacional de Estadística e Informática):** High relevance

La propuesta de marco estadístico de la Economía Informal, es muy relevante para el país porque proporciona recomendaciones para la conceptualización e identificación de todos los aspectos informales de la economía para la mejor medición de este fenómeno socioeconómico lo cual será de utilidad para que los hacedores de políticas emitan leyes para la formalización de la producción y el empleo.

**Georgia (National Statistics Office of Georgia - Geostat):** High relevance

**Belgium (National Bank of Belgium):** Medium relevance

3A. Do you agree with the definitions of informal productive activities and the informal economy? 3B. Please elaborate



**Afghanistan (National Statistics and Information Authority):** Yes

**Ukraine (State Statistics Service of ukraine):** Yes

**Turkey (Turkish Statistical Institute):** Yes

Informal economy definition in updated SNA should be more detailed

**Montserrat (Statistics Department Montserrat):** Yes

The definition speaks to all individual and economic unit outside of any informal arrangement

**China (National Bureau of Statistics):** Yes

**Aruba (CBS):** Yes

**Institut National de la Statistique (Institut National de la Statistique):** Yes

**Таджикистан (Агентство по статистике при Президенте Республики**

**Таджикистан) Tajikistan (Statistics Agency under the President of Republic of Tajikistan):** Yes

**Qatar (Planning and Statistics Authority):** Yes

Definitions are clear and help distinguishing concepts that are some times wrongly used as synonyms.

**Portugal (Statistics Portugal):** Yes

Theoretically yes

**Palestine (Palestinian central bureau of statistics):** Yes

**Egypt (The Central Agency of Public Mobilization and Statistics):** Yes

Because they defined comprehensively and accurately the informal productive activities and informal economy.

**Michael Frosch:** Yes

It is essential to introduce an underlying reference concept that clarifies the statistical basis for the definitions of the different concepts relating to the informal economy

**Indonesia (BPS - Ejih Tasriah):** Yes

**Romania (National Institute of Statistics/ National Bank of Romania):** Yes

The methodological note offers an overview, in a common-base framework, on what to cover in case of data requirements for such aspect.

**Lithuania (Statistics Lithuania):** Yes

**Georgia (National Statistics Office of Georgia):** Yes

**Costa Rica (Banco Central de Costa Rica):** Yes

**Indonesia (BPS - Anisa Nuraini):** Yes

I have note for informal economy definition which refers to general production boundary. This will rise gender issue since unpaid work (such as preparing meals and washing) should be recognized and increase output creation from households own-account production which is irrelevant for taxation, economic policy making, etc.

I propose to have a tiering definition on informal economy which encompass narrow definition (refers to SNA production boundary) and broad definition (refers to SNA general production boundary).

*IETT: The framework for the informal economy allows distinguishing the informal production within the SNA production boundary from informal production only in the general production boundary. Tiered indicators to describe informal production are an excellent suggestion for a practical guidance on the framework.*

**Poland (Statistics Poland):** Undecided

While presented definitions looks interesting and comprehensive, we cannot say "Yes". Mainly due to fact, that proposed definitions are not enough accurate and very broad. Also,

difficulties can be expected in terms of feasibility of calculation of data for specific areas proposed in the informal economy.

**Morocco (High commission for planning):** Yes

**ITALY (ISTAT/NATIONAL ACCOUNTS DIRECTORATE):** Yes

**Armenia (Central Bank of Armenia):** Yes

The definitions are mentioned in this material more clearly explain these two concepts.

**Singapore (Singapore Department of Statistics):** Yes

**Finland (Statistics Finland):** Undecided

**Germany (Destatis (Federal Statistical Office) / Deutsche Bundesbank):** No

The definition should exclude activities of persons in formal sector units (reason see answer 4b).

**Uzbekistan (Central bank UZB):** Yes

**Netherlands (Statistics Netherlands, also on behalf of the Dutch Central Bank):** No

See our elaboration in section 7B.

**SPAIN (INE - STATISTICAL OFFICE and BANK OF SPAIN):** Yes

**BRAZIL (IBGE - INSTITUTO BRASILEIRO DE GEOGRAFIA E ESTATÍSTICA):** Undecided

According to the definition presented, informal productive activities are defined as productive activities carried out by people or economic units that – in law or in practice – have no formal agreements. However, there is a need to better specify the SNA update concerning ‘Services provided by paid domestic staff’. This document by the Informal Economy Task Team does not consider this activity as an exceptional case when allows classifying in terms of formal or informal productive activity. It happens due the fact the informal economy includes sector informal and informal productive activities carried out by household own-use production but excludes registered household own-use production. Furthermore, it’s not clear about how to classify production activities of formal sector enterprises that use informal labor input. For us the production cannot consider informal economy due to the fact we prefer consider only informal input labor as part of informal economy.

*IETT: The framework does recognize production that is undertaken using paid domestic staff as a specific case. The informality of this production is dependent on whether any of the paid domestic staff are formal employees or not.*

*Production of formal sector units is always formal, independent of whether they are using informal labour inputs for their production or not.*

**Mexico (INEGI):** Yes

Yes, we agree.

**United Kingdom (UK Statistics Authority):** Yes

The UK welcomes wider views on whether a definition of “general production boundary” would be useful.

*IETT: As stated in the guidance note (paragraph 10), the general production boundary is defined in the 2008 SNA paragraph 6.25. References to the SNA General production boundary in the guidance note will be corrected to General Production Boundary.*

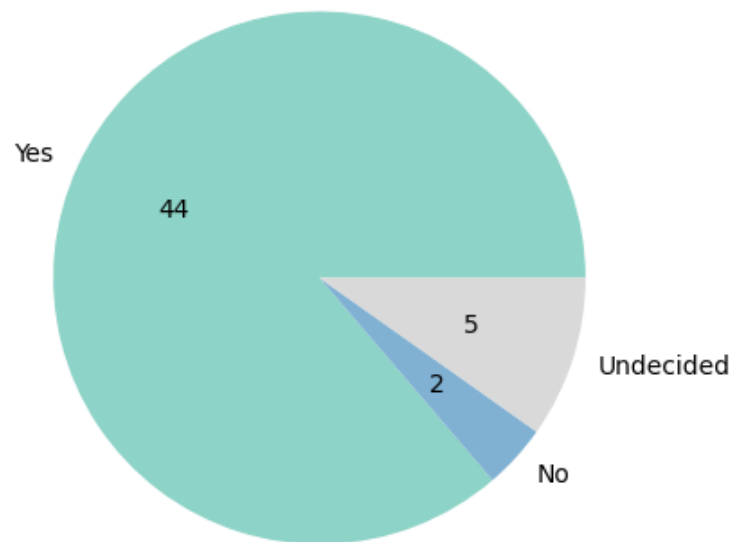
**Latvia (Central Statistical Bureau of Latvia):** Yes

**Perú (Instituto Nacional de Estadística e Informática):** Yes

**Georgia (National Statistics Office of Georgia - Geostat):** Yes

**Belgium (National Bank of Belgium):** Yes

4A. Do you agree that, for the purposes of the framework on informality, economic units should be classified into the three domains: Formal sector Informal sector Household own-use production 4B. Please elaborate



**Afghanistan (National Statistics and Information Authority):** Yes  
This decision tree has made identifying the informal sector very easy.

**Ukraine (State Statistics Service of ukraine):** Yes

**Turkey (Turkish Statistical Institute):** Yes

**Montserrat (Statistics Department Montserrat):** Yes

**China (National Bureau of Statistics):** Yes

**Aruba (CBS):** Yes

**Institut National de la Statistique (Institut National de la Statistique):** Yes

**Таджикистан (Агентство по статистике при Президенте Республики Таджикистан) Tajikistan (Statistics Agency under the President of Republic of Tajikistan):** Yes

**Qatar (Planning and Statistics Authority):** Yes

**Portugal (Statistics Portugal):** No

We agree that "known" units (units that are somehow registered - in Business Register) should be classified accordingly the suggestion. Nevertheless, the process of estimation of "unknown activity" lead to a macro values/results that can't be allocated to individual/specific units. So, from this point of view, we believe that the proposal doesn't deal with this relevant particularity.

*IETT: An approach to achieve better exhaustiveness of statistics on production is to indirect estimation techniques such as balancing. This approach cannot be used to produce statistics on informality because some informal activity may be observed (known) and the unobserved part of the informal economy cannot be delineated from other types of non-observed production using.*

*Units in the business register are, by definition, registered for tax and similar purposes and thus will be classified in the formal sector. Restricting the classification to those economic units would only include formal sector units.*

**Palestine (Palestinian central bureau of statistics):** Yes

**Egypt (The Central Agency of Public Mobilization and Statistics):** Yes  
It makes easy to define, estimate and measure the informal economy.

**Michael Frosch:** Yes

The framework as described is an important alignment with the framework currently developed by the ILO which ensures consistency between economic statistics and social statistics

**Indonesia (BPS - Ejih Tasriah):** Yes

**Romania (National Institute of Statistics/ National Bank of Romania):** Yes

**Lithuania (Statistics Lithuania):** Yes

**Georgia (National Statistics Office of Georgia):** Yes

**Costa Rica (Banco Central de Costa Rica):** Yes

Evaluate the use of the term sector, since it can be confused with the terminology used for institutional sectors. Define the term registered and non-registered.

*IETT: The terms informal sector and formal sector are so well established, that the Task Team believes that they should not be changed.*

*While the term registration is well operationalized when distinguishing which economic units producing mainly for the market are informal and which are formal, it is more complex for household own-use production. Examples should be included in the upcoming practical guidance.*

**Indonesia (BPS - Anisa Nuraini):** Yes

However, the term households own-use production can be misleading since it includes informal NPISHs which is not part of households, also refers to establishment rather than enterprise. This term needs to carefully introduce.

*IETT: As referenced in the glossary for the guidance note the production of informal NPISHs is household own-use production (cf. 2008 SNA paragraphs 23.42 and 4.168) and is part of the household institutional sector and not the NPISH sector.*

**Poland (Statistics Poland):** Undecided

While we assess this decision tree as clear and understandable, we anticipate problems in practical implementation of these theoretical frameworks into National Accounts in the future (theoretically clear, operationally impossible). Especially it seems to be enigmatic, what is included in unregistered HH without employees from the point of view of services - in our opinion implementation of household production of services for own-use should not be included in GDP.

This area would require lot of assumptions and expert estimations that could distort comparability of national accounts aggregates. As a result it could impact the possibility of using GDP data for macroeconomic analysis. The better solution would be to cover this domain by a supplementary/satellite accounts. We think it is necessary to make this part of decision tree more precise (with additional notes and examples).

*IETT: The informal economy includes production that is outside of the SNA production boundary but does not make a recommendation to change this boundary. The recommendations in this guidance note have no conceptual impact what is included or excluded in GDP.*

*In addition, the Task Team recognizes that producing statistics on the complete framework may not be relevant or feasible for many countries.*

**Morocco (High commission for planning):** Yes

**ITALY (ISTAT/NATIONAL ACCOUNTS DIRECTORATE):** Yes

**Armenia (Central Bank of Armenia):** Yes

**Singapore (Singapore Department of Statistics):** Yes

**Finland (Statistics Finland):** Undecided

**Germany (Destatis (Federal Statistical Office) / Deutsche Bundesbank):** No

As the production of the formal sector units would still be part of the formal economy, there would be some double counting between formal and informal economy: The full output of the unit would be formal while part of the costs (informal labour inputs) would count for the output of informal economy. As a consequence, the split between formal and informal economy would be blurred and both together would not add up to total economy. The formal sector should be left out.

*IETT: The guidance note does not propose to use the cost of the informal labour inputs to infer an informal output/informal production in the formal sector.*

*The informal economy cannot be fully exhaustively described using production alone, requires the inclusion of both labour and production components.*

**Uzbekistan (Central bank UZB):** Yes

**Netherlands (Statistics Netherlands, also on behalf of the Dutch Central Bank):** Yes

**SPAIN (INE - STATISTICAL OFFICE and BANK OF SPAIN):** Yes

**BRAZIL (IBGE - INSTITUTO BRASILEIRO DE GEOGRAFIA E ESTATÍSTICA):** Yes

We agree SNA institutional units can be classified in three domains of the economy. The framework clearly distinguishes the term informal sector from the term informal economy which have often been used ambiguously in the past. The later is the overarching concept of the framework and includes all productive activities in the informal sector, the informal productive activities of workers in the formal sector and informal productive activities in the household own-use production domain.

**Mexico (INEGI):** Yes

Yes, we agree.

**United Kingdom (UK Statistics Authority):** Yes

**Latvia (Central Statistical Bureau of Latvia):** Yes

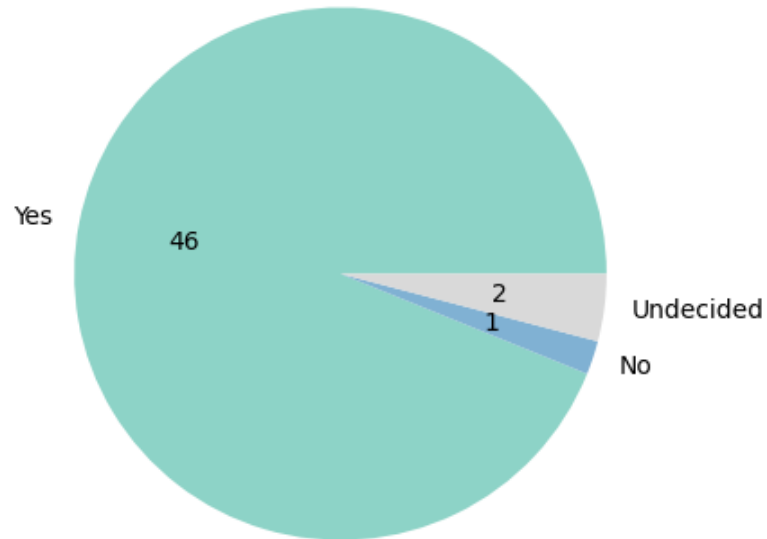
**Perú (Instituto Nacional de Estadística e Informática):** Yes



**Georgia (National Statistics Office of Georgia - Geostat): Yes**

**Belgium (National Bank of Belgium): Yes**

**5A. Do you agree with the definition of the formal sector? 5B. Please elaborate**



**Afghanistan (National Statistics and Information Authority): Yes**

**Ukraine (State Statistics Service of ukraine): Yes**

**Turkey (Turkish Statistical Institute): Yes**

**Montserrat (Statistics Department Montserrat): Yes**

**China (National Bureau of Statistics): Yes**

**Aruba (CBS): Yes**

**Institut National de la Statistique (Institut National de la Statistique): Yes**

**Таджикистан (Агентство по статистике при Президенте Республики Таджикистан) Tajikistan (Statistics Agency under the President of Republic of Tajikistan): Yes**

**Qatar (Planning and Statistics Authority):** Yes

Definition of formal sector is clear and avoid overlapping with informal sector.

**Portugal (Statistics Portugal):** No

**Palestine (Palestinian central bureau of statistics):** Yes

**Egypt (The Central Agency of Public Mobilization and Statistics):** Yes

Yes, it accurately defines, measures and estimate the formal sector in the economy.

**Michael Frosch:** Yes

The recognition of the existence of informal productive activities in the formal sector is not a change compared to the current statistical definition of informal employment. To maintain this possibility is important to recognize the existence of informal labour input in relation to formal enterprises.

**Indonesia (BPS - Ejih Tasriah):** Yes

**Romania (National Institute of Statistics/ National Bank of Romania):** Yes

**Lithuania (Statistics Lithuania):** Yes

**Georgia (National Statistics Office of Georgia):** Yes

**Costa Rica (Banco Central de Costa Rica):** Yes

**Indonesia (BPS - Anisa Nuraini):** Yes

Do we need to elaborate “registration” concept only to general government, along with the digitalization, producer/merchant can register at certain digital platforms mediating their transactions?

*IETT: In general, registration at digital platforms should not be considered as registered for tax or similar. Dependent contractors may, however, be considered formal if the relationship with the economic unit they depend on is formalized even if the household unincorporated enterprise of the dependent contractor is not registered for tax or similar. The recommendation on the treatment is being discussed in the ILO Working group for the Revision of the standards for statistics on informality.*

**Poland (Statistics Poland):** Yes

**Morocco (High commission for planning):** Yes

**ITALY (ISTAT/NATIONAL ACCOUNTS DIRECTORATE):** Yes

**Armenia (Central Bank of Armenia):** Yes

**Singapore (Singapore Department of Statistics):** Yes

**Finland (Statistics Finland):** Yes

**Germany (Destatis (Federal Statistical Office) / Deutsche Bundesbank): Yes**

We do agree with the formal sector definition given in paragraph 13 of the GN at hand. Our objections (detailed in 4b) begin with the last statement in paragraph 16 "Informal workers include [...] workers carrying out informal volunteer work for the formal enterprise."

**Uzbekistan (Central bank UZB): Yes**

**Netherlands (Statistics Netherlands, also on behalf of the Dutch Central Bank): Yes**

**SPAIN (INE - STATISTICAL OFFICE and BANK OF SPAIN): Yes**

The estimation of the services produced by households for their own final use is clear from a conceptual point of view, but it can be very complex to compile from a practical point of view.

**BRAZIL (IBGE - INSTITUTO BRASILEIRO DE GEOGRAFIA E ESTATÍSTICA): Yes**

In our view, this document clarifying the definition of the formal sector based on figure 1. However, SNA updates should replace Figure 25.4 (SNA 2008) which demonstrates the connection and treatment between the ILO definition of the sector and to the institutional sectors of the SNA.

*IETT: If the guidance note will be endorsed by the BOPCOM and the AEG, chapter 25 will be revised in the 2025 SNA to reflect the framework for the informal economy.*

**Mexico (INEGI): Yes**

**United Kingdom (UK Statistics Authority): Yes**

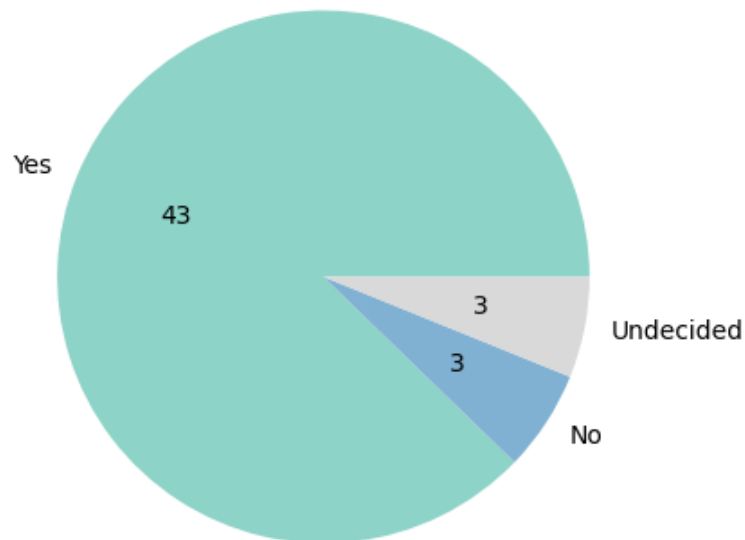
**Latvia (Central Statistical Bureau of Latvia): Yes**

**Perú (Instituto Nacional de Estadística e Informática): Yes**

**Georgia (National Statistics Office of Georgia - Geostat): Yes**

**Belgium (National Bank of Belgium): Yes**

6A. Do you agree that underdeclared and undeclared production activities of formal sector enterprises should not be considered for the framework on the informal economy, and that they should rather be considered as non-observed for purposes of exhaustive measurements of production? 6B. Please elaborate



**Afghanistan (National Statistics and Information Authority):** Yes

**Ukraine (State Statistics Service of ukraine):** Yes

**Turkey (Turkish Statistical Institute):** Yes

**Montserrat (Statistics Department Montserrat):** Yes

Yes i agree to some extent under declared and undeclared production activities of formal sector enterprises can also be considered as legal activities

**China (National Bureau of Statistics):** Yes

**Aruba (CBS):** Yes

**Institut National de la Statistique (Institut National de la Statistique):** Yes

**Таджикистан (Агентство по статистики при Президенте Республики Таджикистан) Tajikistan (Statistics Agency under the President of Republic of Tajikistan):** Yes

**Qatar (Planning and Statistics Authority):** Yes

It clarifies on what is included and excluded from informal production activities. It is inferred that there is no informal production activities in the formal sector, but only informal inputs (labour). Hence, informality in the formal sector is only observable from "the perspective of workers" and not from "the perspective of economic units".

**Portugal (Statistics Portugal):** No

It is just a question of convention and harmonization. In our view, economic activity should be split in two parts: i) formal sector; and ii) informal sector. The formal sector/activity should include all (direct) observed activity, obtained through any kind of (observed) data source (grossed-up survey, census, administrative data, etc.). All the rest (estimated values) obtained through macro or micro models, estimations, etc. should be considered informal sector (doesn't matter if it is legal or illegal, produced under formal or informal units, whatever the institutional sector is....).

*IETT: What is described here is the non-observed economy. The informal economy and informal sector are, however, not the same as the non-observed economy. The purpose of the framework for the informal economy is not to achieve exhaustive measures of production (cf. paragraph 3 in the guidance note).*

**Palestine (Palestinian central bureau of statistics):** Yes

**Egypt (The Central Agency of Public Mobilization and Statistics):** Yes

They underdeclared or undeclared activities (activities already carried out by the formal sector but hidden) not are informal. They are underdeclared or undeclared for some other issues such as taxes evasion and they represent underreporting issues.

**Michael Frosch:** Yes

This definition is very welcomed, because it creates a clear boundary between the framework of informal economy and undeclared economy as well as with the non-observed economy. This will contribute to create a concept of informal economy that is more clear and stringent and avoiding a situation where the concept of informal economy becomes a residual that more or less equals to the non-observed economy and hence will continue to differ between organizations/countries and users

**Indonesia (BPS - Ejih Tasriah):** Yes

it is a form of concealed economy, not informal economy

**Romania (National Institute of Statistics/ National Bank of Romania):** Yes

**Lithuania (Statistics Lithuania):** Yes

**Georgia (National Statistics Office of Georgia):** Yes

**Costa Rica (Banco Central de Costa Rica):** Yes

**Indonesia (BPS - Anisa Nuraini):** Yes

If we set registration or formally recognized as filter in deriving informality, then under declared and undeclared production activities are another issue (measurement issue, not in the informality framework).

**Poland (Statistics Poland):** No

In our opinion non-observed economy and GDP balancing process indirectly cover informal labour input in informal sector. Answering "Yes" to that question could cause conceptual conflict between N6 and the informal sector.

*IETT: Non-observed economy and GDP balancing process indirectly cover un- and underdeclared production in the formal sector (at the same time with other types of non-observed production). It cannot describe informal labour inputs in the formal sector – a presentation of these labour inputs has no impact on GDP.*

**Morocco (High commission for planning):** No

in our opinion, underdeclared production goes hand in hand with informal employment. in this sense it must be integrated into the informal economy

*IETT: It is true that production carried out with informal labour inputs can be underdeclared. The Task Team argues that this does not mean that the production is informal. This point will be further elaborated in the guidance note.*

**ITALY (ISTAT/NATIONAL ACCOUNTS DIRECTORATE):** Yes

**Armenia (Central Bank of Armenia):** Yes

Underdeclared and undeclared production activities of formal sector enterprises should be differentiated from the informal economy, because these two type of production activity are different from informal activity by their nature, and the separate statistics about underdeclared and undeclared production can show the dynamic of development of these type of production activities which will be useful for legal authorities of the country. I mean underdeclared and undeclared production activities should be considered as a part of non-observed economy, because it can help to estimate the using of countries' resources more correctly.

**Singapore (Singapore Department of Statistics):** Yes

**Finland (Statistics Finland):** Yes

**Germany (Destatis (Federal Statistical Office) / Deutsche Bundesbank):** Yes

This part of production is of little relevance for the policy goals in the context of informal economy. Therefore, the framework for informal economy should exclude them.

**Uzbekistan (Central bank UZB):** Yes

**Netherlands (Statistics Netherlands, also on behalf of the Dutch Central Bank):** Yes

**SPAIN (INE - STATISTICAL OFFICE and BANK OF SPAIN): Yes**

We consider that both should remain as part of the non-observed economy measurement and exhaustiveness adjustments.

**BRAZIL (IBGE - INSTITUTO BRASILEIRO DE GEOGRAFIA E ESTATÍSTICA): Yes**

Underdeclared and underground production activities of formal sector enterprises are not part of the informal economy and should be considered as non-observed. If there are informal workers engaged in these activities in the formal sector enterprise only labor inputs should be considered as part of informal economy.

**Mexico (INEGI): Yes**

It is important to assume the Non-observed economy framework and to consider the undeclared production as formal production. This is also right for the purpose of coordination with the NOE framework.

**United Kingdom (UK Statistics Authority): Yes**

**Latvia (Central Statistical Bureau of Latvia): Yes**

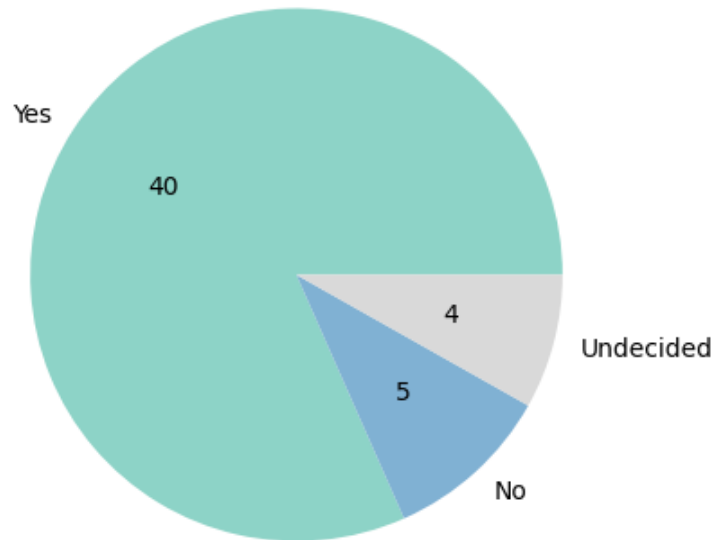
**Perú (Instituto Nacional de Estadística e Informática): Yes**

**Georgia (National Statistics Office of Georgia - Geostat): Yes**

**Belgium (National Bank of Belgium): Yes**

We agree with the distinction, however the risk of overlap is large.

7A. Do you agree that formal sector units can use informal labour inputs for their production and that these informal labour inputs are part of the informal economy? 7B. Please elaborate



**Afghanistan (National Statistics and Information Authority):** Yes

**Ukraine (State Statistics Service of ukraine):** Yes

**Turkey (Turkish Statistical Institute):** Yes

**Montserrat (Statistics Department Montserrat):** Yes

**China (National Bureau of Statistics):** Yes

**Aruba (CBS):** No

I think the informal labor inputs are part of the formal economy, but they are part of the informal labor sector

*IETT: The three domains that are considered for the informal economy classify economic units. Informal labour exists in all three domains.*

**Institut National de la Statistique (Institut National de la Statistique):** Yes



**Таджикистан (Агентство по статистике при Президенте Республики Таджикистан) Tajikistan (Statistics Agency under the President of Republic of Tajikistan):** Yes

**Qatar (Planning and Statistics Authority):** Yes

The distinction about the "perspective of workers" and the "perspective of economic units" is crucial (I think) to understand this point and avoid the potential confusion that can create the idea that informal labour inputs are part of informal economy but the output of this informal labour inputs is not part of the informal economy. Perhaps this point can be made more explicit in the guidance note.

*IETT: The suggestion to be more explicit is noted.*

**Portugal (Statistics Portugal):** Yes

**Palestine (Palestinian central bureau of statistics):** Undecided

**Egypt (The Central Agency of Public Mobilization and Statistics):** Yes

Some professional, freelancers or informal labors can provide services for formal sector such as electrician, plumber, writers, designers, .... etc who provide works for wages for formal sector.

**Michael Frosch:** Yes

See previous comment. When looking at data regarding informal employment it is clear that formal economic units also uses informal labour input, in other words this is necessary to acknowledge in order to reflect the real situation in countries.

**Indonesia (BPS - Ejih Tasriah):** Yes

**Romania (National Institute of Statistics/ National Bank of Romania):** Yes

**Lithuania (Statistics Lithuania):** Yes

**Georgia (National Statistics Office of Georgia):** Yes

**Costa Rica (Banco Central de Costa Rica):** Yes

**Indonesia (BPS - Anisa Nuraini):** Yes

Nevertheless, it poses a consequence to separate employees and all economic activities in the same sector which using both formal and informal labor (such as unprotected outsourcing workforce and unpaid trainee). It is easier to separate employee number but quite hard to derive all economic activities in the current accounts (such as production), especially separation activities in the accumulation accounts.

**Poland (Statistics Poland):** Yes

See answer 6B.

**Morocco (High commission for planning):** Yes

**ITALY (ISTAT/NATIONAL ACCOUNTS DIRECTORATE):** Yes

**Armenia (Central Bank of Armenia):** Yes

**Singapore (Singapore Department of Statistics):** Yes

**Finland (Statistics Finland):** Yes

**Germany (Destatis (Federal Statistical Office) / Deutsche Bundesbank):** No

See answer to 4b - As the production of these formal sector units would still be part of the formal economy, there would be some double counting between formal and informal economy: The full output of the unit would be formal while part of the costs (informal labour inputs) would count for the output of informal economy. As a consequence the split between formal and informal economy would be blurred and both together would not add up to total economy.

**Uzbekistan (Central bank UZB):** Yes

**Netherlands (Statistics Netherlands, also on behalf of the Dutch Central Bank):** No

We do not agree that the output of an unpaid family member or unpaid worker is defined as an informal productive activity as we cannot measure how much output is generated by each type of employment (formal or informal).

How do you determine what part of output to allocate to each type of employment? It is not clear to us how to do this. Furthermore, the production value is reported to the tax authorities and also registered as formal by the authorities.

*IETT: While labour inputs in the formal sector can be informal, calculating the output resulting from informal labour is not suggested in the guidance note. Production in the formal sector is always formal and informality in the formal sector can only be described from a labour statistics perspective.*

**SPAIN (INE - STATISTICAL OFFICE and BANK OF SPAIN):** Yes

**BRAZIL (IBGE - INSTITUTO BRASILEIRO DE GEOGRAFIA E ESTATÍSTICA):** Yes

. Formal sector can use informal labor inputs and these inputs are part of informal economy. Anyway, we do not agree with estimating these activities as part of informal economy as shown in the last line of Box3. We can consider, only informal labor input as part of informal economy. Present this data classifying these activities is a statistical challenge.

*IETT: It is exactly the intention of the guidance note that there will be no informal production in the formal sector.*

*The last line of box 3 - Productive activities - can refer to both labour inputs and production and, in the case of the formal sector, is restricted to labour inputs. Production in the formal sector is always formal.*

**Mexico (INEGI):** Yes

It is common to observe informal labour inputs in the Mexican economy in the formal sector.

**United Kingdom (UK Statistics Authority):** Yes

UK have been working closely with Labour Statisticians around the treatment of dependent contractors which we can see being a lead example of a unit being part of the informal sector that can operate within a formal sector framework

From an operational perspective, this may be challenging to implement. Much of the UK economy has been formalised and this may not be standardised across all international countries. So, even if we have dependent contractors operating, the legislative requirements and, or VAT thresholds have helped to formalise this setup in the UK.

Matt Hughes to provide a UK perspective on how this will be interpreted: e.g. different legislative framework, VAT thresholds etc.

Other points to be considered are who is and isn't included for the UK and that we have largely formalized our economy which other nations may have not. Do we have any examples of this formalization?

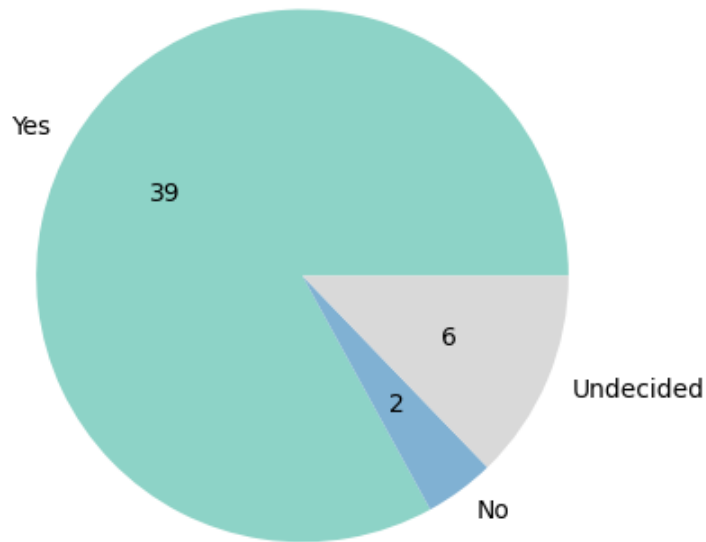
**Latvia (Central Statistical Bureau of Latvia):** Yes

**Perú (Instituto Nacional de Estadística e Informática):** Yes

**Georgia (National Statistics Office of Georgia - Geostat):** Yes

**Belgium (National Bank of Belgium):** Yes

8A. Do you agree with the definition of the informal sector? The definition includes the following, which are not part of the current ILO definition of the informal sector: Production is mainly intended for the market (compared to at least some production for the market in the current definition). Informal sector agricultural production is included (and not optional). The only conceptual criterion for informality of unincorporated household enterprises producing mainly for the market is registration for tax or similar purposes (and not the size of the enterprise). 8B. Please elaborate



**Ukraine (State Statistics Service of ukraine):** Yes

**Turkey (Turkish Statistical Institute):** Yes

**Montserrat (Statistics Department Montserrat):** Undecided

**China (National Bureau of Statistics):** Yes

**Aruba (CBS):** Yes

**Institut National de la Statistique (Institut National de la Statistique):** No

**Таджикистан (Агентство по статистике при Президенте Республики Таджикистан) Tajikistan (Statistics Agency under the President of Republic of Tajikistan):** Yes

**Qatar (Planning and Statistics Authority):** Yes

Agree.

Is "mainly intended for the market" a stronger requirement than "at least some production for the market" or a lighter one? I mean, does it require that more than 50% is sold in the market or just the declaration of intention is good enough.

*IETT: Before responding, we should note that in practice, the distinction will be most relevant for agricultural production. Most other production activities of households are either completely for own consumption or only produced for the market with the intention of receiving a profit.*

*From a policy perspective the intent of the production is crucial. If a household intends to be a market producer, the members of the household are working for pay or profit. The vulnerability that comes along with informally working for pay or profit, is quite different than if the household is, for example, subsistence farming and coincidentally sells some of their products. Policy goals for these two types of production will also differ greatly.*

**Portugal (Statistics Portugal):** Yes

**Palestine (Palestinian central bureau of statistics):** Yes

**Egypt (The Central Agency of Public Mobilization and Statistics):** Yes

Because if their production are not intended for market, they consider for own use-production, which consider Household own use production. For informal sector agricultural production because it is a part of the household sector either for own use or for market. They are not registered for tax or other similar purposes.

**Michael Frosch:** Yes

This would all be important changes.

Point 1 is an important alignment to the 19th ICLS resolution I and will also create a concept of informal sector that more clearly reflects that the primary objective with informal economic units is to create income and employment for those concerned.

Point 2. Agriculture production is globally highly exposed to informality, and the inclusion of agriculture is also necessary for a comprehensive measurement of the informal sector

Point 3. Strictly conceptually then registration would be the key criterion however, operationally additional criteria are needed.

**Indonesia (BPS - Ejih Tasriah):** Yes

**Romania (National Institute of Statistics/ National Bank of Romania):** Yes

**Lithuania (Statistics Lithuania):** Yes

**Georgia (National Statistics Office of Georgia):** Yes

**Costa Rica (Banco Central de Costa Rica):** Yes

**Indonesia (BPS - Anisa Nuraini):** Yes

Main intention and registration filter make informality framework clearer. Also agree with treatment in agriculture sector.

For confirmation, even we set “mainly” as filter, the units can use part of the same output for own-use. So, in the informality context, the latter output should be mapped to informal economy or still aggregated in the formal economy since it result from the same establishment?

*IETT: The complete production should be assigned to the informal sector, if the enterprise produces mainly for the market and is informal, to the formal sector, if the enterprise is formal, and to the household own-use production domain if it is mainly producing for own-final consumption.*

*This is similar to how production of enterprises is assigned to only one industry even if it has a secondary production activity that would be classified differently.*

**Poland (Statistics Poland):** Undecided

For first bullet point - Undecided: While changing "At least some" to "Mainly" is a step in the right direction, we still consider this definition too vague and what does "mainly intended for the market" mean in practice.

For second bullet point - The further explanation should be provided, if the informal sector agricultural production should be also mainly intended for the market.

For third bullet point - Yes

**Morocco (High commission for planning):** Yes

**ITALY (ISTAT/NATIONAL ACCOUNTS DIRECTORATE):** Yes

**Armenia (Central Bank of Armenia):** Yes

**Singapore (Singapore Department of Statistics):** Yes

**Finland (Statistics Finland):** Yes

**Germany (Destatis (Federal Statistical Office) / Deutsche Bundesbank):** Yes

**Uzbekistan (Central bank UZB):** Undecided

**Netherlands (Statistics Netherlands, also on behalf of the Dutch Central Bank):**

Undecided

We agree on the first two points. One would expect the third point to be: The only conceptual criterion for unincorporated household enterprises producing mainly for the market to be considered informal is that there is NO registration for tax or similar purposes.

*IETT: Yes, the framework categorizes unincorporated household enterprises in the informal sector if their production is mainly intended for the market and if they are not registered for tax or similar purposes.*

**SPAIN (INE - STATISTICAL OFFICE and BANK OF SPAIN):** Yes

**BRAZIL (IBGE - INSTITUTO BRASILEIRO DE GEOGRAFIA E ESTATÍSTICA):** Yes

Yes. Production is mainly intended for the market (compared to at least some production for the market in the current definition). Economic units that are not formally recognized are in the informal sector if their production is mainly intended for the market, whether the production is done in a household unincorporated enterprise and whether the enterprise is informal, that is, whether the economic units have the same characteristics of informal companies (characteristics of informal companies that are in the chapter 25, SNA 2008).

Yes. Informal sector agricultural production is included (and not optional). The informal sector includes agricultural production by unincorporated family businesses, provided the informality criteria are met. This is a departure from the current ILO definition of the informal sector, but it is necessary to define the operationalization of this definition of the informal sector. We believe that the activity should be treated like other activities to separate them between the formal and informal sectors and that, in the case of Brazil, formal family farming should have representation. However, our data on agricultural activity are not very detailed.

Yes. The conceptual criterion for informality of unincorporated household enterprises producing mainly for the market is registration for tax or similar purposes. The size of the enterprise should not be considered as a criterion to classify unincorporated household enterprises as informal. This is a departure from the operationalization of the current definition of the informal sector, but size can be a useful criterion for evaluating the structure of family production if small businesses are similar to unincorporated household enterprises.

**Mexico (INEGI):** Yes

We agree with the proposed definitions, nonetheless in statistical terms or in practice it is a challenge to collect information for agricultural production for the three types of production: own-use, formal and informal.

**United Kingdom (UK Statistics Authority):** Yes

The UK requires more clarification on the third bullet but agrees with the others

**Latvia (Central Statistical Bureau of Latvia):** Yes

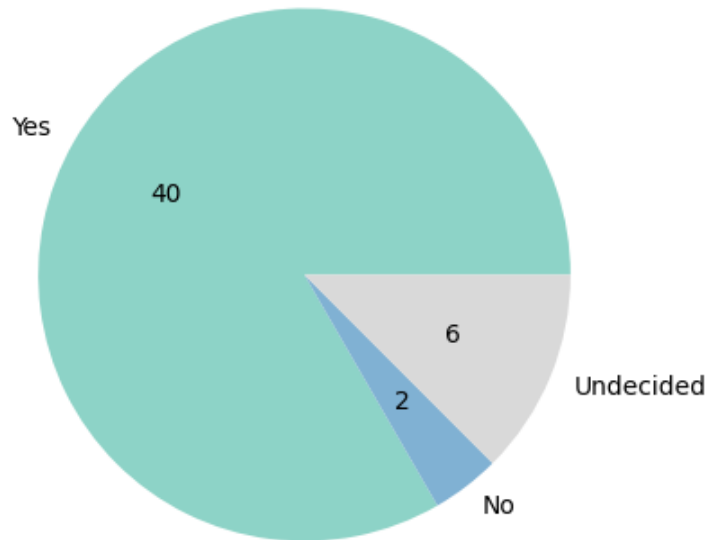
**Perú (Instituto Nacional de Estadística e Informática):** Yes

**Georgia (National Statistics Office of Georgia - Geostat):** Yes

**Belgium (National Bank of Belgium):** Yes

We agree with the concepts as proposed here, but we want to warn that it will be very difficult to put this in practice.

9A. Do you agree with the description of the household own-use production domain? 9B.  
Please elaborate



**Afghanistan (National Statistics and Information Authority): Yes**

**Ukraine (State Statistics Service of ukraine): Yes**

**Turkey (Turkish Statistical Institute): Yes**

**Montserrat (Statistics Department Montserrat): Yes**

**China (National Bureau of Statistics): Yes**

**Aruba (CBS): Yes**

**Institut National de la Statistique (Institut National de la Statistique): No**

**Таджикистан (Агентство по статистики при Президенте Республики Таджикистан) Tajikistan (Statistics Agency under the President of Republic of Tajikistan): Yes**

**Qatar (Planning and Statistics Authority): Yes**

**Portugal (Statistics Portugal): Yes**



**Palestine (Palestinian central bureau of statistics):** Yes

**Egypt (The Central Agency of Public Mobilization and Statistics):** Yes

Because it includes the sources of supply of own consumption either from production for own use, NPISH and volunteers those provide goods and services only for household own-use.

**Michael Frosch:** Yes

Taken into account that the other two domains are termed sector, this domain could be called household own-use production sector for consistence. Well aware that this differs from the concepts of institutional sectors as defined by the SNA

*IETT: The terms are not yet final. Consistency of the terminology in the work on the framework by the Informal Economy Task Team and the ILO Working Group on the Revision of the Standards for Statistics on Informality are crucial.*

**Indonesia (BPS - Ejih Tasriah):** Yes

**Romania (National Institute of Statistics/ National Bank of Romania):** Yes

**Lithuania (Statistics Lithuania):** Yes

**Georgia (National Statistics Office of Georgia):** Yes

**Costa Rica (Banco Central de Costa Rica):** Yes

**Indonesia (BPS - Anisa Nuraini):** Yes

Since it contains informal NPISHs, then the term of "households own-use production" should be used carefully.

Household own-use services other than housing services of owner-occupiers and paid domestic staff are outside SNA production boundary. It proposed to tier the definition of informal economy to narrow and broad definition.

**Poland (Statistics Poland):** No

Very broad approach from the terms of the definition, what cause lack of precision required in National Accounts. We have doubts about feasibility of calculation of this production and the high risk of overlapping in individual domains. However, the most important issue is the conceptual one mentioned in answer 4B. Research of this area is not our priority work.

*IETT: See response above.*

**Morocco (High commission for planning):** Yes

**ITALY (ISTAT/NATIONAL ACCOUNTS DIRECTORATE):** Yes

**Armenia (Central Bank of Armenia):** Yes

**Singapore (Singapore Department of Statistics):** Yes

**Finland (Statistics Finland):** Undecided

In theory maybe yes but it is not very clear when we talk about household own-production domain compared to household own-production. In practice it could be difficult to find informal NPISH units.

**Germany (Destatis (Federal Statistical Office) / Deutsche Bundesbank):** Yes

**Uzbekistan (Central bank UZB):** Yes

**Netherlands (Statistics Netherlands, also on behalf of the Dutch Central Bank):** Yes

**SPAIN (INE - STATISTICAL OFFICE and BANK OF SPAIN):** Yes

**BRAZIL (IBGE - INSTITUTO BRASILEIRO DE GEOGRAFIA E ESTATÍSTICA):** Undecided

We agree that informal production in the field of production for the own use of households includes: households that produce goods and services intended primarily for their own use; informal or temporary ISFLSF that produce goods and services; direct volunteer work. However, the SCN production limit only includes: family production involving informal workers, informal production by families producing goods for their own use, informal or temporary ISFLSF producing goods, direct volunteers producing goods.

The production of services by households for their own use through the hiring of paid domestic staff is within the production limit of the SCN (SCN 2008, para. 6.2). The doubt arises in proposals 32 and 33 when separating the form of hiring of domestic workers, placing as belonging to the informal economy only those who are not registered “32. Paid domestic staff are employed by households who are using the labour to produce goods and services for own use. This production is only informal if all paid domestic staff are informal employees.

33. Production of services of households for own use by engaging paid domestic staff is inside the SNA production boundary (2008 SNA, para. 6.2). Therefore, the production and employment of informal paid domestic staff should be separately identified within the household production for own use domain of the informal economy.”

The concepts of informal productive activity and domain are confused with their own use of households.

*IETT: To clarify, if households engage employees for the production of goods and services for the final consumption of the household, this production is household own-use production. The economic unit that undertakes the production is the household and not the employee.*

*However, the inclusion or exclusion of this production in the informal economy depends on whether the employee is informal or formal.*

**Mexico (INEGI):** Yes

We agree with, and as in previous answer, it is a challenge to collect information for agricultural production for the three types of production: own-use, formal and informal, and also for other manufacturing production including construction of household building.

**United Kingdom (UK Statistics Authority):** Yes

The description ensures that services are inclusive for the modern age.

**Latvia (Central Statistical Bureau of Latvia):** Yes

**Perú (Instituto Nacional de Estadística e Informática):** Undecided

Parece demasiada amplia la descripción de la producción para el uso propio del hogar, por lo que debería ser mejor analizada sobre todo considerando los objetivos de política a los que estaría asociada, de esa manera se podría tener una delimitación mejor de lo que se considera producción del uso propio del hogar.

*IETT: Household own-use production is defined in the SNA. Extension beyond the SNA production boundary to include all production of services for own-use are well established in supplementary presentations. The framework is only a tool to identify whether the production is informal or not.*

**Georgia (National Statistics Office of Georgia - Geostat):** Yes

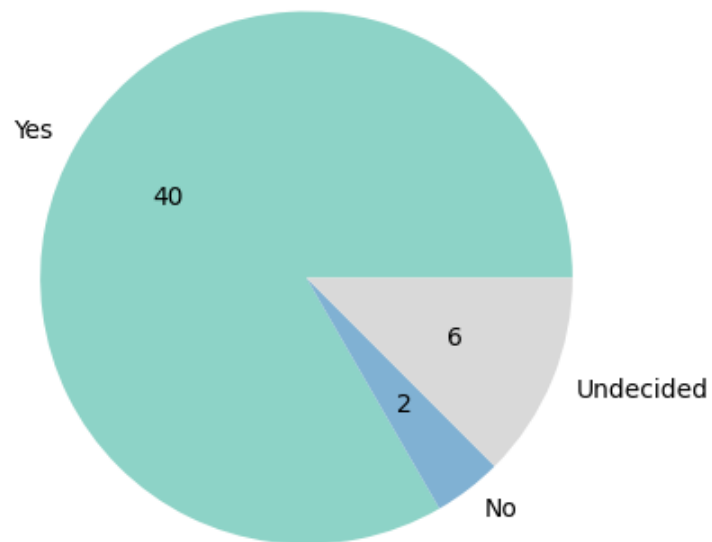
**Belgium (National Bank of Belgium):** Yes

Conceptually we agree, but this is impossible to put in practice. Some ethical concerns also need to be taken into account: how to value volunteer work f.e.

*IETT: The valuation of volunteer work and household production for own-use are dealt with in the NPI Handbook and in the guidance note WS.3 Unpaid Household Service Work.*

**10. Do you agree that the following types of household own-use production activities are not part of the from the informal economy?**

- **Housing services of owner-occupiers (please find a description in the glossary in the annex of the guidance note).**
- **Registered household own-use production.**
- **Unregistered household production of goods and services if households employ any formal employees.**



**Afghanistan (National Statistics and Information Authority): Yes**

**Ukraine (State Statistics Service of ukraine): Yes**

**Turkey (Turkish Statistical Institute): Yes**

**Montserrat (Statistics Department Montserrat): Yes**

**China (National Bureau of Statistics): Undecided**

**Aruba (CBS): Yes**

**Institut National de la Statistique (Institut National de la Statistique): Yes**

**Таджикистан (Агентство по статистики при Президенте Республики Таджикистан) Tajikistan (Statistics Agency under the President of Republic of Tajikistan): Yes**

**Qatar (Planning and Statistics Authority): Yes**

**Portugal (Statistics Portugal): Yes**

**Palestine (Palestinian central bureau of statistics): Yes**

**Egypt (The Central Agency of Public Mobilization and Statistics): Yes**

**Michael Frosch: Yes**

**Indonesia (BPS - Ejih Tasriah): Yes**

**Romania (National Institute of Statistics/ National Bank of Romania): No**

**Lithuania (Statistics Lithuania): Yes**

**Georgia (National Statistics Office of Georgia): Yes**

**Costa Rica (Banco Central de Costa Rica): Yes**

**Indonesia (BPS - Anisa Nuraini): No**

**Poland (Statistics Poland): Yes**

**Morocco (High commission for planning): Yes**

**ITALY (ISTAT/NATIONAL ACCOUNTS DIRECTORATE): Yes**

**Armenia (Central Bank of Armenia): Yes**

**Singapore (Singapore Department of Statistics): Yes**

**Finland (Statistics Finland): Yes**

**Germany (Destatis (Federal Statistical Office) / Deutsche Bundesbank): Yes**

**Uzbekistan (Central bank UZB): Undecided**

**Netherlands (Statistics Netherlands, also on behalf of the Dutch Central Bank): Yes**

**SPAIN (INE - STATISTICAL OFFICE and BANK OF SPAIN): Yes**

**BRAZIL (IBGE - INSTITUTO BRASILEIRO DE GEOGRAFIA E ESTATÍSTICA): Yes**

**Mexico (INEGI): Yes**

**United Kingdom (UK Statistics Authority): Yes**

**Latvia (Central Statistical Bureau of Latvia):** Yes

**Perú (Instituto Nacional de Estadística e Informática):** Yes

**Georgia (National Statistics Office of Georgia - Geostat):** Yes

**Belgium (National Bank of Belgium):** Yes

**11A. Which type(s) of household production activities should not be excluded from the informal economy? Please select all that apply.**

**China (National Bureau of Statistics):** Household production of goods and services if households employ any formal employees

**Egypt (The Central Agency of Public Mobilization and Statistics):**

Housing services of owner-occupiers is imputed in national Accounts. •

Household own-use production are registered for receiving profits, thus, they are formal and not part of informal activity.

For unregistered household production of goods and services because households employ formal employees, thus, they are formal but not a part of informal

**Romania (National Institute of Statistics/ National Bank of Romania):** Formal household own-use production without employees

**Indonesia (BPS - Anisa Nuraini):** Housing services of owner-occupiers should not be excluded.

I need to rethink to exclude housing services of owner-occupier, just based on consideration that no informal labor inputs used for this production activity. The activity has an output recorded in the GDP. Then where should it be mapped to measure informal economy if household own-use production does not recognize it?

While unpaid work such as preparing meals and washing recognized as an imputation in the in the informality framework, why the same treatment cannot be attributed to housing services of owner-occupier?

*IETT: The Task Team believes that the exclusion based on the grounds that no informal labour inputs are used is valid. Even though the guidance note focuses on the perspective of the economic unit, the perspective of the worker is equally, if not more important to the framework.*

**Uzbekistan (Central bank UZB):** -

**Singapore (Singapore Department of Statistics):**

Agree that the above activities (refer to the three options given in 11A) should be excluded.

**BRAZIL (IBGE - INSTITUTO BRASILEIRO DE GEOGRAFIA E ESTATÍSTICA):**

Housing services of owner-occupiers are included in the production boundary and they are

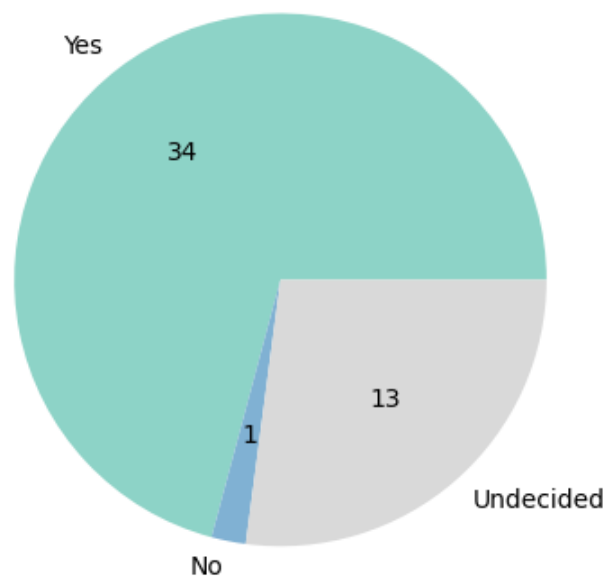
not part of the from the informal economy. They are deemed to be equal in value to the rentals that would be paid on the market for accommodation of the same size, quality and type, taking into account taxes paid on housing (cf., 2008 SNA 9.65). This value is imputed when compiling the national accounts. The SNA production boundary excludes the other services produced by households for their own use if the households do not engage employees to undertake this production.

For this purpose, the framework assigns all SNA institutional units to either the formal sector, the informal sector, or the household own-use production domain. All formally recognized economic units are in the formal sector. Economic units that are not formally recognized are in the informal sector if their production is mainly intended for the market and if they have profit. Economic units that are not formalized and produce mainly for own-use are classified in the household own-use production domain. Unregistered household production of goods and services could be an exception. This production could be informal if paid domestic staff are formal or informal employees because their production had the characteristic of family production intended exclusively to household own-use.

**Mexico (INEGI):**

No further comments.

**12A. Do you agree that the preferred treatment of dependent contractors should be to classify all dependent contractors as owners and operators of unincorporated household enterprises (with production for the market)? 12B. Please elaborate**



**Afghanistan (National Statistics and Information Authority):** Yes

**Ukraine (State Statistics Service of Ukraine):** Yes

**Turkey (Turkish Statistical Institute):** Undecided

An example may be given to describe more precisely the dependent contractors.

**Montserrat (Statistics Department Montserrat):** Undecided

**China (National Bureau of Statistics):** Yes

**Aruba (CBS):** Yes

**Institut National de la Statistique (Institut National de la Statistique):** Yes

**Таджикистан (Агентство по статистике при Президенте Республики Таджикистан) Tajikistan (Statistics Agency under the President of Republic of Tajikistan):** Yes

**Qatar (Planning and Statistics Authority):** Yes

**Portugal (Statistics Portugal):** Yes

**Palestine (Palestinian central bureau of statistics):** Yes

**Egypt (The Central Agency of Public Mobilization and Statistics):** Yes

Because they consider as owners and operators of unincorporated household enterprises and they consider a part of the informal sector if they are not registered for tax or similar purposes and in the formal sector otherwise.

**Michael Frosch:** Undecided

From the point of view of SNA this could be a pragmatic approach. However, dependent contractors is a specific category of workers with its own characteristics. This might call for an adjusted definition for this particular group. We are still awaiting the outcome of the ongoing discussions within the ILO WG before having a clear position on this issue.

**Indonesia (BPS - Ejih Tasriah):** Yes

**Romania (National Institute of Statistics/ National Bank of Romania):** Yes

**Lithuania (Statistics Lithuania):** Undecided

It is not fully clear who the dependent contractors are. The definition should be more clearly described with possible practical examples.

*IETT: Dependent contractors are defined in the revised International Classification of Status in Employment (ICSE-18). To limit the length of the guidance note, the definitions have been moved to the glossary, or the source has been provided.*

**Georgia (National Statistics Office of Georgia):** Yes



**Costa Rica (Banco Central de Costa Rica):** Undecided

Consider the income and whether it is recorded for tax purposes.

**Indonesia (BPS - Anisa Nuraini):** Yes

As they use their own tools to provide good and services exclusively for one economic unit and receive the risk of their own production failure then I agree to treat dependent contractor into owner and operator of unincorporated household enterprises as long they are considered in household institutional unit which cannot separate their business full set of accounts from household balance sheets.

*IETT: To clarify, the criterion that dependent contractors cannot create a complete set of accounts for their business is implicit in the definition of dependent contractors (“do not have an incorporated enterprise”).*

**Poland (Statistics Poland):** Yes

**Morocco (High commission for planning):** Yes

**ITALY (ISTAT/NATIONAL ACCOUNTS DIRECTORATE):** Undecided

In Italian National accounts dependent contractors are currently classified as indicated in question 12A.

However in Italy the number of these "partially self-employed" workers is quite significant. In 2020, the Labour force survey estimates 415 thousand of them, that is about 11% of the total self-employed with no employees.

Therefore also taking into account the “Resolution concerning statistics on work relationships” of the 20th International Conference of Labour Statisticians (Geneva, 10-19 October 2018) we are currently evaluating, together with our colleagues of labour market statistics,

the possibility (and the feasibility) of classifying these subjects as employees.

*IETT: The classification of workers into employees or dependent contractors is not in scope of this guidance note. The note only provides the perspective of the Task Team/National Accounts Community how to identify which dependent contractors should be considered informal.*

**Armenia (Central Bank of Armenia):** Yes

**Singapore (Singapore Department of Statistics):** Yes

**Finland (Statistics Finland):** Yes

**Germany (Destatis (Federal Statistical Office) / Deutsche Bundesbank):** Yes

**Uzbekistan (Central bank UZB):** Undecided

**Netherlands (Statistics Netherlands, also on behalf of the Dutch Central Bank):** Yes

**SPAIN (INE - STATISTICAL OFFICE and BANK OF SPAIN):** Yes

**BRAZIL (IBGE - INSTITUTO BRASILEIRO DE GEOGRAFIA E ESTATÍSTICA):** Yes

Yes. Dependent contractors have contractual arrangements of a commercial nature (but not a contract of employment) to provide goods or services for or through another economic unit; are paid by commercial transactions and do not have an incorporated enterprise, thus are: in employment for profit and are usually responsible for arranging their own social insurance and income tax; do not employ one or more persons as an employee and are operationally and/or economically dependent on another entity that exercises control over their productive activities and directly benefits from the work performed by them. From a National Accounts perspective, the preferred treatment would be to classify all dependent contractors as owners and operators of unincorporated household enterprises.

**Mexico (INEGI):** Yes

We agree with the proposed treatment but it depends on the legal law changes in the next years.

**United Kingdom (UK Statistics Authority):** Yes

**Latvia (Central Statistical Bureau of Latvia):** Yes

**Perú (Instituto Nacional de Estadística e Informática):** Undecided

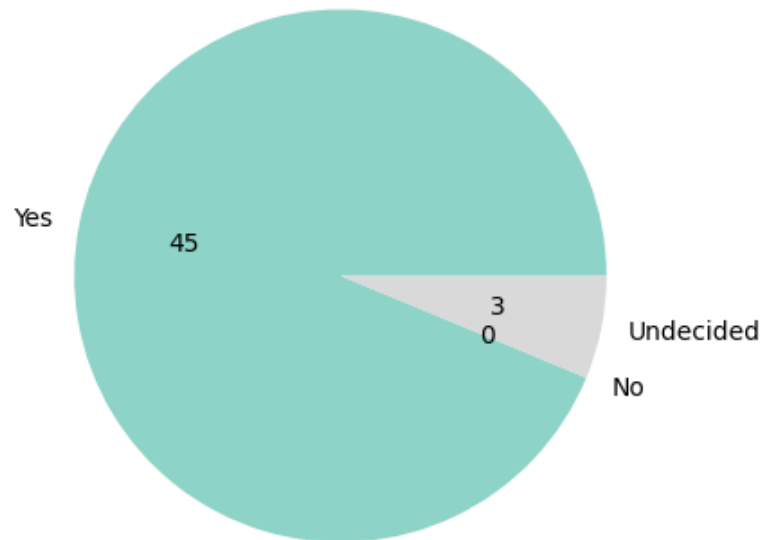
Es necesario desarrollar criterios más específicos sobre el tema y contar con mayor casuística.

**Georgia (National Statistics Office of Georgia - Geostat):** Yes

**Belgium (National Bank of Belgium):** Undecided

This is not clear to us.

13A. Do you agree with the description of illegal activities? 13B. Please elaborate



**Afghanistan (National Statistics and Information Authority): Yes**

**Ukraine (State Statistics Service of ukraine): Yes**

**Turkey (Turkish Statistical Institute): Yes**

**Montserrat (Statistics Department Montserrat): Yes**

**China (National Bureau of Statistics): Yes**

**Aruba (CBS): Yes**

**Institut National de la Statistique (Institut National de la Statistique): Yes**

**Таджикистан (Агентство по статистике при Президенте Республики Таджикистан) Tajikistan (Statistics Agency under the President of Republic of Tajikistan): Yes**

**Qatar (Planning and Statistics Authority): Yes**

**Portugal (Statistics Portugal): Yes**

**Palestine (Palestinian central bureau of statistics): Yes**

**Egypt (The Central Agency of Public Mobilization and Statistics):** Yes

Because it encompasses the production and producers. They are not registered because of their illegal products or because they are not licensed to produce such legal products such as non-physician provides medical services.

**Michael Frosch:** Yes

**Indonesia (BPS - Ejih Tasriah):** Yes

**Romania (National Institute of Statistics/ National Bank of Romania):** Yes

**Lithuania (Statistics Lithuania):** Yes

**Georgia (National Statistics Office of Georgia):** Yes

**Costa Rica (Banco Central de Costa Rica):** Yes

**Indonesia (BPS - Anisa Nuraini):** Yes

**Poland (Statistics Poland):** Yes

**Morocco (High commission for planning):** Yes

**ITALY (ISTAT/NATIONAL ACCOUNTS DIRECTORATE):** Yes

**Armenia (Central Bank of Armenia):** Yes

**Singapore (Singapore Department of Statistics):** Yes

**Finland (Statistics Finland):** Yes

**Germany (Destatis (Federal Statistical Office) / Deutsche Bundesbank):** Yes

**Uzbekistan (Central bank UZB):** Yes

**Netherlands (Statistics Netherlands, also on behalf of the Dutch Central Bank):** Yes

**SPAIN (INE - STATISTICAL OFFICE and BANK OF SPAIN):** Yes

**BRAZIL (IBGE - INSTITUTO BRASILEIRO DE GEOGRAFIA E ESTATÍSTICA):** Yes

. There are two kinds of illegal production (2008 SNA para. 6.43): a) The production of goods or services whose sale, distribution or possession is forbidden by law; b) Production that is usually legal but becomes illegal when carried out by unauthorized producers. In both of them the 2008 SNA states, "...illegal actions that fit the characteristics of transactions are treated the same way as legal actions." The production or consumption of certain goods or services, such as narcotics, may be illegal, if the purpose is to generate income, they must be recorded in the national accounts.

**Mexico (INEGI):** Yes

No further elaboration.

**United Kingdom (UK Statistics Authority):** Yes

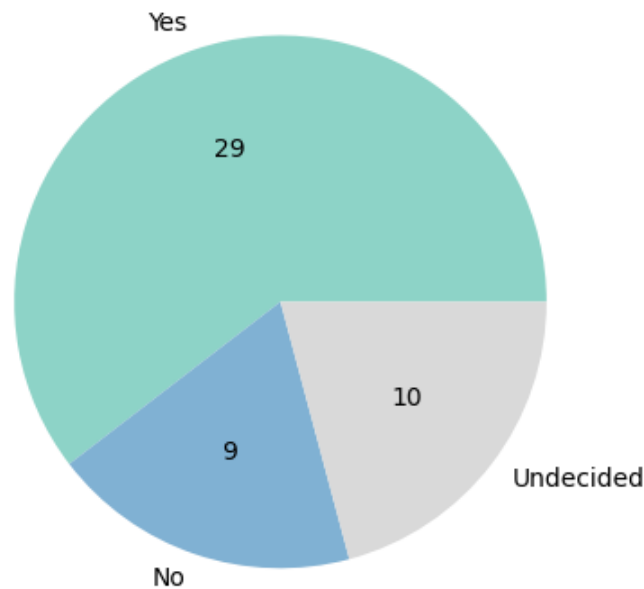
**Latvia (Central Statistical Bureau of Latvia):** Yes

**Perú (Instituto Nacional de Estadística e Informática):** Yes

**Georgia (National Statistics Office of Georgia - Geostat):** Yes

**Belgium (National Bank of Belgium):** Yes

14A. Do you agree with the recommendation of the Task Team to exclude type a) illegal productive activities from the informal economy by convention and supplement statistics on informality with measures of type a) illegal productive activities? 14B. Please elaborate



**Afghanistan (National Statistics and Information Authority):** No

Then, how comparable will be the results since illegal has different definitions in the context of each country. At the same time, "illegal productive activities" as a separate measure shows the extent of a government's will and power over the implementation of laws and regulations, which is not a concern of the National Accounts as such.

**Ukraine (State Statistics Service of Ukraine):** Yes

**Turkey (Turkish Statistical Institute):** Yes

**Montserrat (Statistics Department Montserrat):** Yes

**China (National Bureau of Statistics):** Yes

**Aruba (CBS):** Yes

**Institut National de la Statistique (Institut National de la Statistique):** No

**Таджикистан (Агентство по статистике при Президенте Республики Таджикистан) Tajikistan (Statistics Agency under the President of Republic of Tajikistan):** Yes

**Qatar (Planning and Statistics Authority):** Undecided

Since most illegal productive activities would be part of the informal economy, it could be considered to include these activities within informal activities to show the complete picture of informality while showing illegal activities as "of which" detailed data for policy analysis.

*IETT: This option has been discussed extensively in the Task Team and the recommendation to exclude type a) illegal activities and to supplement statistics on informality with statistics on illegal production is the result of a large expert group consultation of the AEG, BOPCOM, and the ILO Working Group on the revision of the statistical standards on informality.*

**Portugal (Statistics Portugal):** No

We think that illegal economic activity is within the scope of NA. So, in our view, it is part of informal economy.

*IETT: Illegal transactions are inside the SNA production boundary and are conceptually in GDP. This does not mean, however, that the production is informal.*

**Palestine (Palestinian central bureau of statistics):** Yes

**Egypt (The Central Agency of Public Mobilization and Statistics):** Yes

Because they provide by unauthorized individuals

**Michael Frosch:** Yes

This would be in line with the ILO recommendation 204, Transition from the Informal to the Formal Economy and reflects the differences in policy objectives and measures to address respectively informal productive activities and illegal productive activities. It also contributes to creating clearer boundaries around the informal economy and reflects that measuring informal economy and illicit activities of type a) would require different methodology and data sources

**Indonesia (BPS - Ejih Tasriah):** Yes

illegal activity also a part of conceal economy

**Romania (National Institute of Statistics/ National Bank of Romania):** Undecided

**Lithuania (Statistics Lithuania):** Undecided

The recommendation is not clear.

**Georgia (National Statistics Office of Georgia):** Yes

**Costa Rica (Banco Central de Costa Rica):** Undecided

In countries where illegality is significant, it is difficult to separate it from informality

*IETT: It is true that this delineation can be difficult from a practical perspective.*

**Indonesia (BPS - Anisa Nuraini):** Yes

**Poland (Statistics Poland):** No

From our perspective recommendation should either exclude or include everything related to illegal activity. Further breakdowns of illegal economy would be confusing for data users.

*IETT: This breakdown is in the 2008 SNA (para 6.43). The reason the two types of illegal activities identified in the SNA are treated differently is that, from a policy perspective type b) is similar to informal activities.*

**Morocco (High commission for planning):** Yes

indeed, the nature of these activities (illegal productive activities type 2) means that they cannot be in the same group as informal activities which may be subject to different public policies aimed at making them formal.

**ITALY (ISTAT/NATIONAL ACCOUNTS DIRECTORATE):** Yes

**Armenia (Central Bank of Armenia):** Yes

**Singapore (Singapore Department of Statistics):** Yes

**Finland (Statistics Finland):** Undecided

It is not clear why there should be different way of compilation to these two types of illegal production.

This might make differences between various countries depending on what is included and excluded.

**Germany (Destatis (Federal Statistical Office) / Deutsche Bundesbank):** Yes

This is the same case as for undeclared/underdeclared production – this part of production is of little relevance for the policy goals in the context of informal economy. Therefore, the framework for informal economy should exclude them.

**Uzbekistan (Central bank UZB):** Yes

**Netherlands (Statistics Netherlands, also on behalf of the Dutch Central Bank):** Yes

**SPAIN (INE - STATISTICAL OFFICE and BANK OF SPAIN):** No

We consider it is better to keep the N2 estimate undivided, not to partition it between the

formal and informal economy, for consistency with question 6 on other exhaustiveness adjustments (N1, N6) and for the practical complexity involved in separating it.

*IETT: The framework for the informal economy is not a tool for exhaustive measures of production.*

**BRAZIL (IBGE - INSTITUTO BRASILEIRO DE GEOGRAFIA E ESTATÍSTICA):** Yes  
Yes, we agree due to conceptual aspects. Anyway, to identify and measure illegal production to present this data in supplement statistics with the resources currently available will be challenging.

**Mexico (INEGI):** Yes  
In the trade activities they might be trade of both illegal and legal products that were stolen.

**United Kingdom (UK Statistics Authority):** Undecided  
The UK requires more clarification on this question and would find examples of how this may be implemented useful.

**Latvia (Central Statistical Bureau of Latvia):** Yes

**Perú (Instituto Nacional de Estadística e Informática):** Yes

**Georgia (National Statistics Office of Georgia - Geostat):** Yes

**Belgium (National Bank of Belgium):** No  
The legal character of an activity depends on the legislation of a country. If comparability of the estimate for the informal economy is the aim of the exercise, it would be better to have one estimate and not supplement with illegal activities but include them at the base.

#### **15. Do you have any comments on Section VII.1 Digitalization?**

**Turkey (Turkish Statistical Institute):** This part is important to be aware of HH participation in production activities in informal economy facilitated by digitalization

**Montserrat (Statistics Department Montserrat):** No questions

**China (National Bureau of Statistics):** Agree that digital platforms can be a useful source of data, as many types of informal economic activities are recorded by them.

**Aruba (CBS):** No

**Таджикистан (Агентство по статистике при Президенте Республики Таджикистан) Tajikistan (Statistics Agency under the President of Republic of Tajikistan):** Нет (UNECE Translation: No)

**Qatar (Planning and Statistics Authority):** No.

**Egypt (The Central Agency of Public Mobilization and Statistics):** No



**Romania (National Institute of Statistics/ National Bank of Romania):** No comments.

**Indonesia (BPS - Anisa Nuraini):** Agree with the coverage of household activities facilitated by digitalization is based on SNA definition. Digitalization also brings more simplification to households to reach vast potential customer by being registered as merchant and open their virtual store in some marketplaces. It is a challenge to record and classify the unit as independent contractor rather than dependent contractor.

**Poland (Statistics Poland):** Topic requires further consideration. For the time being, digital platforms are not useful and insufficiently well recognised sources of data.

**Morocco (High commission for planning):** we are aware of challenges posed by digitalization in the extent of informal activities facilitated by digitalization and that can be the subject of in-depth research in relation to the digital economy.

**Uzbekistan (Central bank UZB):** I agree with this statement. Because of Digitalization, most of economic activities can be hidden and statistic departments may not be able to cover all information. However it is 21st century and activities (economics, business and producing and etc.) with digitalization is more faster and modern, that's why there should be found ways to deal with it.

**SPAIN (INE - STATISTICAL OFFICE and BANK OF SPAIN):** Not at this moment.

**BRAZIL (IBGE - INSTITUTO BRASILEIRO DE GEOGRAFIA E ESTATÍSTICA):** We agree with the conceptual aspects and do not have more comments about this topic.

**Mexico (INEGI):** No further comments.

**United Kingdom (UK Statistics Authority):** The significant challenge with digitalisation and the informal economy is the way data is increasingly being used in new and innovative ways which may be beyond the scope and/or knowledge of the original producer.

For example: If someone publishes an amusing image on the web purely to share with friends and it goes on to be the defining image of a high-impact advertising campaign for a multi-national company, is that part of the informal economy? NSOs would normally say 'no' because there was no initial reward and no 'transaction'. However, digitalisation and the way data assets can hold public good qualities of non-rivalrous use and non-excludability suggest this line may struggle to be held so cleanly in the future, particularly in the light of other guidance notes's which query the produced/non-produced distinction.

The UK advises careful consideration is given to this topic in light of other relevant guidance notes.

*IETT: The Task Team believes that the discussion whether certain activities are production is out of scope of this guidance note.*

**Latvia (Central Statistical Bureau of Latvia):** No.

**Perú (Instituto Nacional de Estadística e Informática):** Las medidas de aislamiento social para contrarrestar los contagios de la Covid-19, ha posicionado a la digitalización en los procesos productivos, muchos trabajadores dependientes e independientes realizan sus actividades desde sus domicilios, por lo que debería tratarse a la digitalización como una herramienta transversal a todos los sectores institucionales y poder evaluar de mejor manera su carácter formal o informal.

**Belgium (National Bank of Belgium):** Very general description, no particular comments.

**16. Do you have any comments on Section VII.2 Informal Cross Border Flows and VII.3 Illicit Financial Flows?**

**Montserrat (Statistics Department Montserrat):** No comments

**China (National Bureau of Statistics):** Suggest that UN should publish a handbook on how to measure informal cross-border flows.

**Aruba (CBS):** No

**Таджикистан (Агентство по статистике при Президенте Республики Таджикистан) Tajikistan (Statistics Agency under the President of Republic of Tajikistan):** Нет

**Qatar (Planning and Statistics Authority):** No.

**Egypt (The Central Agency of Public Mobilization and Statistics):** NO

**Romania (National Institute of Statistics/ National Bank of Romania):** No comments.

**Indonesia (BPS - Anisa Nuraini):** No

**Poland (Statistics Poland):** Regarding Cross Border Flows, these are included in non-observed economy in majority.

The Issue of Illicit Financial Flows should be a subject of further investigation. The feasibility of developing of relevant statistics has to be taken into account.

**Morocco (High commission for planning):** Our economy is, among others, experiencing transactions involving illicitly imported or exported goods and services. this is why we have started cooperation with the office in charge of balance of payments and foreign trade statistics to determine the extent of these flows

**ITALY (ISTAT/NATIONAL ACCOUNTS DIRECTORATE):** Italy participated in the UNODC/UNCTAD task force on the measurement of IFFs and supports the proposed framework.

Italy is in favour of participating in experimental exercises for the measurement of IFFs from illegal activities in the scope of NA and BEPS

**Germany (Destatis (Federal Statistical Office) / Deutsche Bundesbank):** Though we agree with most of the conceptual issues described in the section, there seems to be room for further elaboration. For example, activities given under (ii) “informal services” deal only with travel. There may be other relevant domains like transport or maintenance and repair, where services related to the informal economy are provided to foreign units. Furthermore, the example of online marketplaces for accommodation rental seems to be of little relevance, because service providers are easily observed by authorities. This may lead to relatively low shares of informal providers in this field.

**Uzbekistan (Central bank UZB):** I agree with that

**SPAIN (INE - STATISTICAL OFFICE and BANK OF SPAIN):** Not at this moment.

**BRAZIL (IBGE - INSTITUTO BRASILEIRO DE GEOGRAFIA E ESTATÍSTICA):** We do not have comments about this topic

**Mexico (INEGI):** The only comments is related to collect information for the purpose of financial a cross border flows. In other words, it is required improvement of the statistical collection.

**United Kingdom (UK Statistics Authority):** No comment

**Latvia (Central Statistical Bureau of Latvia):** No.

**Perú (Instituto Nacional de Estadística e Informática):** Flujos transfronterizos informales: Las cuentas nacionales comprenden un marco exhaustivo de medición de la economía, y dentro de ella se incluyen las transacciones entre residentes y no residentes, la identificación de flujos transfronterizos informales es todo un reto, por encontrarse dentro de la economía no observada y también pueden incluir actividades informales, sin embargo no deja de ser importante por que contribuye a que los hogares puedan satisfacer sus necesidades.

Flujos financieros ilícitos: Sería interesante que se pueda ampliar los mecanismos de incorporación de los flujos financieros ilícitos a las cuentas nacionales, porque independientemente de si de derivan de transacciones legales o ilegales estos flujos financieros afectan la composición de los saldos en las hojas de balance.

**Belgium (National Bank of Belgium):** No

**17. Do you have any other comments on the guidance note?**

**Montserrat (Statistics Department Montserrat):** No other comments

**China (National Bureau of Statistics):** No.

**Таджикистан (Агентство по статистике при Президенте Республики Таджикистан) Tajikistan (Statistics Agency under the President of Republic of Tajikistan):** Нет (UNECE Translation: No)

**Qatar (Planning and Statistics Authority):** No.

**Egypt (The Central Agency of Public Mobilization and Statistics):** NO

**Romania (National Institute of Statistics/ National Bank of Romania):** No comments.

**Lithuania (Statistics Lithuania):** The abbreviation SNA next to the term "general production boundary" in Guidance Note should be avoided to make clearer distinction between terms "production boundary in the SNA" and "the general production boundary".

*IETT: Thank you for the comment the note will be amended accordingly.*

**Indonesia (BPS - Anisa Nuraini):** No

**Poland (Statistics Poland):** There is an error in question 14 – 2 times there are a), but should be a) and b).

We suggest to develop a table/scheme of interlinkages between informal and non-observed economy with numerical examples for clear presentation of the informal economy coverage. The conceptual issue concerning implementation of household production services for own use as well as voluntary services into production boundary should be reconsidered. Presented approach to the scope and granularity of informal economy is not feasible for implementation from our point of view.

**Finland (Statistics Finland):** It might be good to rethink the naming of terms (i.e. informal sector, household production for own-consumption domain,...)

**Uzbekistan (Central bank UZB):** It would be perfect if there are some researches and investigations on illegal activities

**SPAIN (INE - STATISTICAL OFFICE and BANK OF SPAIN):** Not at this moment

**BRAZIL (IBGE - INSTITUTO BRASILEIRO DE GEOGRAFIA E ESTATÍSTICA):** . It's important for the IBGE National Accounts Coordination this experimental estimate exercise in measuring informal activities production based on labor statistics (Continuous Pnad). SNA update should include, in addition to these conceptual aspects, guidelines with a tabular approach for the dissemination of these data.

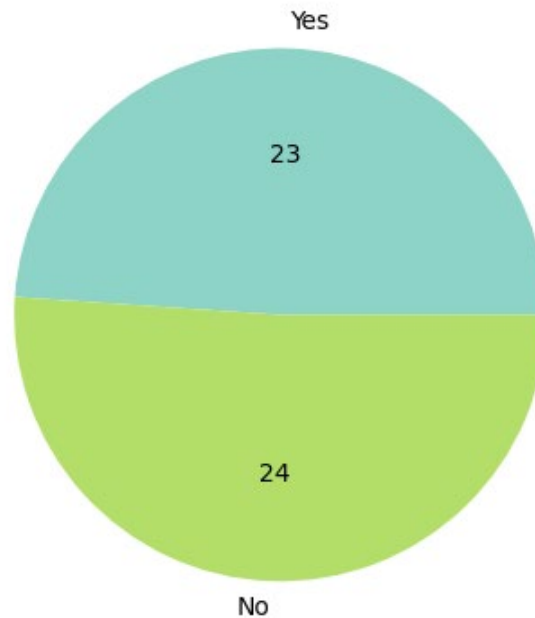
**Mexico (INEGI):** It is a solid statistical framework proposal the problem will arise in practice given the available sets of statistics

**United Kingdom (UK Statistics Authority):** The UK would be interested in participating in an experimental estimate exercise, but this will need to be prioritised within our organisations. There we cannot fully commit.

**Latvia (Central Statistical Bureau of Latvia):** No.

**Perú (Instituto Nacional de Estadística e Informática):** Seria deseable que la nota de orientación venga acompañada por casuística que permita graficar mejor los conceptos señalados.

**18. Would your institution be interested in participating in an experimental estimate exercise?**



**Afghanistan (National Statistics and Information Authority):** Yes

**Ukraine (State Statistics Service of ukraine):** No

**Turkey (Turkish Statistical Institute):** No

**Montserrat (Statistics Department Montserrat):** Yes

**China (National Bureau of Statistics):** Yes

**Aruba (CBS):** No

**Institut National de la Statistique (Institut National de la Statistique):** Yes

**Таджикистан (Агентство по статистики при Президенте Республики Таджикистан) Tajikistan (Statistics Agency under the President of Republic of Tajikistan):** Yes

**Qatar (Planning and Statistics Authority):** Yes

**Portugal (Statistics Portugal):** No

**Palestine (Palestinian central bureau of statistics):** No

**Egypt (The Central Agency of Public Mobilization and Statistics):** Yes

**Indonesia (BPS - Ejih Tasriah):** Yes

**Romania (National Institute of Statistics/ National Bank of Romania):** No

**Lithuania (Statistics Lithuania):** No

**Georgia (National Statistics Office of Georgia):** Yes

**Costa Rica (Banco Central de Costa Rica):** Yes

**Indonesia (BPS - Anisa Nuraini):** Yes

**Poland (Statistics Poland):** No

**Morocco (High commission for planning):** Yes

**ITALY (ISTAT/NATIONAL ACCOUNTS DIRECTORATE):** Yes

**Armenia (Central Bank of Armenia):** Yes

**Singapore (Singapore Department of Statistics):** No

**Finland (Statistics Finland):** No

**Germany (Destatis (Federal Statistical Office) / Deutsche Bundesbank):** No

**Uzbekistan (Central bank UZB):** Yes

**Netherlands (Statistics Netherlands, also on behalf of the Dutch Central Bank):** No

**SPAIN (INE - STATISTICAL OFFICE and BANK OF SPAIN):** No

**BRAZIL (IBGE - INSTITUTO BRASILEIRO DE GEOGRAFIA E ESTATÍSTICA):** Yes

**Mexico (INEGI):** No

**United Kingdom (UK Statistics Authority):** Yes

**Latvia (Central Statistical Bureau of Latvia):** No

**Perú (Instituto Nacional de Estadística e Informática):** Yes

**Georgia (National Statistics Office of Georgia - Geostat):** Yes

**Belgium (National Bank of Belgium):** No