

21/10/2022 Position Paper

EFAMRO and ESOMAR Position Paper

A Response to the consultation on European Statistical System- making it fit for the future.

This paper is submitted on behalf of:

EFAMRO the European Federation of Associations of Market Research Organisations. Founded in 1992, EFAMRO represents the interests of market, opinion and social research in Europe. Its members are national trade associations for research businesses.¹

ESOMAR the global voice of the data, research and insights community since 1947, it promotes the value of market, opinion and social research and data analytics.²

1. About Market, Opinion and Social Research

1.1. EFAMRO and ESOMAR represent the data, research and insights sector, accounting for in Europe a reported annual turnover of €20.87 billion.³

1.2. Market, opinion and social research is the systematic gathering and interpretation of information about individuals or organisations using the statistical and analytical methods and techniques of the applied social, behavioural and data sciences to gain insight or support decision making. It involves systematic study of different spheres of society, politics, and the economy. Research, insight and analytics stand at the heart of all well-informed commercial, social and political decisions. Insight into what makes a product, business initiative or government policy work is often the hidden – yet defining – factor between success and failure. It is our sector that provides the deeper intelligence needed for our world today.

1.3. Many research and analytics providers subscribe to established self-regulation schemes that enable research respondents and participants to enforce their rights. These are built on established international standards set forth by the ICC/ESOMAR International Code and national codes across many EU countries.

2. Our comments

Research aims at providing an unbiased, representative, and active voice to individuals. To reach this objective, research requires a combination of complex systems of sources. Indeed, no single source can have all the answers. Research contributes to better understanding providing

¹ EFAMRO, <https://www.efamro.eu>

² ESOMAR, <https://www.esomar.org>

³ ESOMAR Global Market Research Report, which includes contributions from national associations including EFAMRO members: <https://esomar.org/global-market-research-report>

context to data, explaining the reasons for data trends and statistics. Whilst data provides the 'what', research provides the 'why'.

This is why we disagree with the assertion that: *“the attendant risks of increasing the gap between traditional and cutting edge, up-to-date production processes, with the ultimate result that users would rely less and less on official statistics and the public and businesses be less and less willing to participate in traditional methods of data collection”*.

Research techniques constantly evolve, adapting to changing participant habits and preferences, enabling participant voices to continue to be heard and understood. The need to understand and represent 'lived experiences' is becoming more important, not less, and research data collection is one way that such insights are brought to the fore.

Therefore, we urge the Commission to consider a much more holistic approach, which recognises the value of different types of data sources and uses these to build a data infrastructure and ecosystem. The ideal solution is a data strategy that uses a wide variety of data sources, builds on the value of each type of data generating approach, leveraging the insight each data sources bring to provide a complete picture, rather than a strategy with an over reliance on one type of approach over another.

3. We therefore encourage the Commission to:

3.1 Carefully consider traditional data sources such as surveys, qualitative and statistical research. Overlooking traditional data sources could potentially compromise studies such as Eurobarometer.

3.2 Adopt a generalised survey-based approach and then to seek to progressively plug with new data sources. This would also provide consistent trend data, which is created and adapted by the Commission ensuring that data is fit for purpose and available to use. The risk of relying on third party data is that the Commission would be unable to control the basis on which data is created or changed decreasing the value of the data and the holistic integrity of the statistics.

3.3 Address the digital divide to ensure better representation. Research must be representative and include those citizens who lack access to the internet/or who are not regular users/whose data does not feature in 'new data sources'. This should be an important consideration, as in some populations these groups remain sizeable and some seldom heard participants tend to be disadvantaged and are the focus of EU policy support. The current proposals risk acerbating inequalities. Research data has the benefit of complete coverage and is relatively cost efficient.

3.4 Determine the value of trend data. The value of data increases when it can be compared to previous periods and long-term trends can be identified.

3.5 Consider the integrity of data supply and the challenges around using data held by third party businesses for example:

- The lack of consistent data collection approaches and definitions used by providers – resulting in incomparable data which would require significant amounts of work to be undertaken to render it sufficiently robust to be usable. Whereas data that is collected for a specific purpose can be fit-for-purpose immediately without the need for additional cost, resource, and time heavy processes.
- Data consistency between providers – in the example given of tourism statistics – all possible sources from Airbnb, guest houses, booking sites, to individuals booking directly would all have to be captured for all possible destinations. Value, trips, duration, and family members would have to be made consistent. Every data set produced by a third party business in this area will be produced in a different way, with different definitions and to different standards and protocols. Compared with this challenge, research methodologies are much more efficient alternatives. For example, undertaking a survey to measure the overall market – and then plugging in more specific data as it becomes available to answer specific more granular questions would be a more pragmatic approach.
- The production of a regular supply of data cannot be assumed. Business organisations may stop providing data depending on their management, ownership, and systems. How would major international businesses with ‘walled gardens’ react to sharing their data which might be protected by copyright for example. How would organisations outside the EU react? Will SMEs be properly reflected?
- Greater recognition of the ethically robust research data collection practices is needed. Research practitioners and organisations adhere to ethical Codes of Conduct and best practice guidelines when collecting data, ensuring that citizens and participants are protected when sharing their data for research purposes. There is no such assurances in place when using third party business data.

Moreover, we wish to draw your attention to the fact that currently statistical research benefits from exceptions under article 89 of the GDPR.

4. Next steps

5.1. EFAMRO and ESOMAR welcome the opportunity to further assist the Commission revising this Regulation. To contact us for more information:

For EFAMRO: Kaleke Kolawole, Head of Policy: kaleke.kolawole@efamro.eu

For ESOMAR: Claudio Gennaro, Senior Advocacy Programmes Coordinator:
claudio.gennaro@esomar.org