



HELLENIC REPUBLIC



HELLENIC STATISTICAL AUTHORITY

**ELSTAT**  
**Statistical Confidentiality Policy**  
**for International Trade in Goods Statistics**

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The present statistical confidentiality policy aims at delineating standardised rules and principles regarding the dissemination of International Trade in Goods Statistics, in accordance with the European Statistics Code of Practice and the current European legislative framework for the above statistics.

## **1. Concepts – definitions**

- The term *reporting unit* on the trade with EU countries (Intra-Union trade) means, in accordance with [Regulation \(EU\) 2019/2152](#) of the European Parliament and of the Council, and its Commission Implementing [Regulation \(EU\) 2020/1197](#), the registered commercial enterprise or legal entity, for VAT purposes, in the EU member state, that has the obligation of collecting the data. The *reporting unit* may delegate this obligation to a third party, however, this delegation does not limit in any way its responsibility. Based on the current institutional framework, the EU member states collect data on trade with Third Countries (Extra-Union trade), in accordance with the provisions of Articles 4 and 5 (3) of Regulation (EU) 2019/2152 and of Annex V of the Implementing Regulation (EU) 2020/1197, which are transmitted by Customs Authorities (administrative data).
- The term *passive confidentiality* means the suppression, by the National Statistical Authorities, of data from the publicly available International Trade in Goods Statistics (Intra-Union trade and Extra-Union trade), only at the written request of the reporting units, whose individual data could be indirectly disclosed (indirect identification) from the published statistics, and if the request is accepted by the National Statistical Authorities. In case the National Statistical Authorities accept the request of a reporting unit, those statistics are disseminated in such a way as not to disclose individual data of the reporting unit, directly or indirectly.
- The term *active confidentiality* means the confidentiality applied to the majority of statistical domains and its application principles are defined in [Regulation \(EC\) 223/2009](#) of the European Parliament and of the Council. By applying active confidentiality, the National Statistical Authorities suppress, by definition, data that could disclose, directly or indirectly, individual data of data providers.

## **2. Application framework**

The application of passive confidentiality for International Trade in Goods Statistics (ITGS) is provided for in Regulation (EU) 2019/2152 and its Implementing Regulation (EU) 2020/1197. The National Statistical Authorities are requested to apply passive confidentiality when disseminating International Trade in Goods Statistics, since the application of active confidentiality could significantly reduce the volume of published statistics, and the collection of analytical data would be of limited value without the possibility of their publication. The application of passive confidentiality allows the publication of much more statistics to meet users' needs and in a way that does not affect the quality of International Trade in Goods Statistics in terms of accuracy, clarity, and comparability.

*In accordance with the provisions of Article 19 of Regulation (EU) 2019/2152, “Only upon request of an importer or exporter of goods, the National Statistical Authority shall decide whether to disseminate statistical results relating to the respective imports or exports without any amendment or, following a reasoned request by that importer or exporter, to amend the statistical results so as to make it impossible to identify that importer or exporter in order to comply with the principle of statistical confidentiality, in accordance with point (a) of Article 20 (3) of Regulation (EC) No 223/2009.”.*

More specifically, International Trade in Goods data are disseminated by trade flow (imports, exports), reference period (month, year, etc.), product code (Combined Nomenclature-CN), partner country, statistical value (value calculated at the national borders of the member states), quantity in net mass (kilograms), supplementary unit (measurement unit of the quantity other than the net mass), mode of transport, Region and Regional Unit. Two types of International Trade in Goods data can be made confidential: the product code and the partner country code in relation to the value or the quantity of the commodity.

When the legal representative of a reporting unit submits a written request to ELSTAT concerning the application of statistical confidentiality in the context of the International Trade in Goods Statistics, ELSTAT investigates whether the said request is reasoned. If the analysis of the reporting unit’s data indicates that the reporting unit has a dominant position and ELSTAT’s criteria for statistical confidentiality in International Trade in Goods Statistics described in Section 3 below apply, ELSTAT informs the legal representative that the data related to the specific product or the partner country, where appropriate, will not be published. The criteria for the application of statistical confidentiality ensure the non-identification of the reporting unit, whether primarily or secondarily, taking into consideration mainly the various statistical classifications used (of products, countries, etc.) and the level of detail of statistics. In case the request is accepted, the statistical results are disseminated in such a way that the disclosure of individual data of the reporting unit is not possible. In particular, the data is not published at a detailed level but is disseminated at a more aggregated level, which does not lead to the extraction of information on the trade transactions of the specific reporting unit. The non-publication of data of the reporting unit, in the following year, presupposes the submission to ELSTAT of a new written reasoned request by the legal representative of the reporting unit and the acceptance of the request by ELSTAT.

### **3. Application criteria of statistical confidentiality for International Trade in Goods Statistics**

The application of passive confidentiality when publishing International Trade in Goods Statistics concerns the quantity and/or value of the commodity and the partner country (product code and partner country code).

#### ***A. Product confidentiality***

The information on a product that may be considered confidential refers either to its value and quantity or to the ratio of these quantities (product price). Consequently,

the information on the product code may be suppressed. Suppression of the product code only takes place when at least one of the following conditions is met:

- a) three (3) or fewer enterprises cover, cumulatively or separately, at least 80% of the total trade for this product.
- b) three (3) or fewer enterprises cover, cumulatively or separately, at least 70% of the total trade for a product / partner country combination.

In case (b), only the product code is suppressed and not the partner country code.

The suppression of a product is done in such a way that as much information as possible about the product is published, while ensuring the confidentiality of the reporting unit. Consequently, a code containing at least an indication of the Combined Nomenclature chapter to which the product belongs is used (e.g., for products of CN Chapter 27, the code will be of the form 27 + spaces).

#### *B. Partner country confidentiality*

Partner country confidentiality applies in exceptional cases, since rarely 1 or at most 3 enterprises cover the majority of trade with a single country. In case an enterprise considers the partner country as commercially confidential, the use of a "secret" country code (code QY for Intra-Union trade and QZ for Extra-Union trade) is considered.

#### **4. Confidentiality of data on International Trade in military items**

International trade in Goods Statistics also cover exports and imports of items intended for military use. Items intended for military use are, e.g., weapons, trucks, cars, aircrafts, fuel, or any supplies for the Armed Forces. The Union statistical legislation allows the member states to transmit less detailed data than those provided for in Section 32, Table 34, and Table 35 of the Implementing Regulation (EU) 2020/1197, when the data falls under military secrecy pursuant to the definitions in force in the member states. In the cases of such data, the National Statistical Authorities should, with regard to the trade in military items that fall under the military secrecy, collect, from the competent administrative authorities or reporting units, at least the total value of these items. If the National Statistical Authorities receive, by the competent national administrative authorities, data falling under military secrecy only in aggregated form, then their total value is included in the total exports and imports.

In parallel, the administrative authorities responsible for imports and exports of military items may request the application of confidentiality for the data of items they have imported or exported that do not fall under military secrecy. In these cases, the usual procedures for the application of passive confidentiality are followed.