

Brussels, 30 October 2015

PROFEL Statistics Collection – Internal Rules

1. The members' individual data must be collected by an **independent third-party** (such as association staff). Only this independent third party should see any companies' individual data.
2. Only **aggregate data** of a number of companies can be published. You can never publish any members' individual data.
3. The market positions of companies contributing to the statistics must not be identifiable from the aggregate data. This means that:
 - a. there must be at least **three contributors** to each published data point; and
 - b. there must be at least three **material** contributors to each data point.

What counts as a "material contributor" varies from market to market and takes account of factors such as the market's transparency/complexity etc. but, as a rule of thumb (and this is only a rule of thumb and nothing more) we often advise that there must be at least three contributors with an individual share of 5% of any data point. For example, if we are analysing the aggregate amount of frozen vegetables in Country X and the four contributing companies account for 50%; 42%; 4% and 4% respectively, we would normally advise against publication. However, if the companies accounted for 48%; 42%; 6% and 4% respectively, we would normally say that publication can go ahead since three companies all individually account for at least 5% of the total.

4. The data should not be recent. What counts as "recent" varies from market to market and depends on how often contracts are formed and how often prices are adjusted. But, for example, you should not publish data for 2015 at the very start of 2016. We would normally advise that for annual statistics, at a minimum, six months should have passed before publication. Therefore 2014 data could be **published from 1 July 2015 onwards**.
5. Linked to how recent the data is, the data exchange should not be too frequent. **Yearly statistics** and not anything more frequent should not pose a difficulty.

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