

Brussels, 18. 05. 2009

Dear Mr Pollock,

Thank you for your letter of 27 March 2009 and for your comments on the European Handbook on Equality Data, and in particular your views on the way non-religious persons should be accounted for in statistical data on discrimination.

May I start by pointing out that it is our understanding, based on the case-law of the European Court of Human Rights to which you refer, that the prohibition of discrimination based on religion and belief covers both religious beliefs and non-religious beliefs, such as atheism and humanism. As a result, discrimination based on non-belief is, in our view, just as unacceptable as discrimination based on religion. Measuring such discrimination is therefore important. The purpose of statistical data is not to map or survey religious or non-religious groups, or to recognise particular religious or ethnic groups, but to identify particular instances of discrimination.

The Handbook on Equality Data refers to the recommendations of the Conference of European Statistics (CES). Its aim as stated in the text is to capture as accurately as possible the discrimination suffered by various religious and non-religious groups. You should also note that the 2008 Eurobarometer survey on discrimination in the European Union included two distinct categories, 'atheist' and 'non-believer/agnostic'.

We note your proposal for a more disaggregated approach to data collection for non-religious persons, but would point out again that such a survey cannot be fully accurate. It is also our understanding that the CES recommendations are basic guidelines which should not prevent the compiling of more detailed statistics.

I hope I have been able to answer your concerns.

Yours sincerely,



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