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#### **WORKING DOCUMENT**

From:	General Secretariat of the Council
To:	Delegations
No. Cion doc.:	10592/22 + ADD1 + ADD2
Subject:	Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Council Regulation (EC) No 1217/2009 as regards conversion of the Farm Accountancy Data Network into a Farm Sustainability Data Network - Comments from the Slovenian delegation

Delegations will find in the annex the comments from the Slovenian delegation on the above-mentioned proposal.

**SLOVENIAN COMMENTS****ON THE FSDN PROPOSAL (DEADLINE 5 SEPTEMBER 2022)**

SI supports the Proposal for a Regulation of the European Parliament and of the Council amending Council Regulation (EC) No 1217/2009 regarding the transformation of the network for collecting accounting data from agricultural holdings into a network for data on farm sustainability, but suggests reflection on the issues listed below:

1. The basic rules should be written down in the basic regulation. The proposed amendments give the Commission the authority to use delegated acts to determine the rules on the determination of the main groups of data to be collected and general rules on the data management procedure;
2. It is important that the MSs will have sufficient time available for the implementation and adaptation of the national legislation for the introduction of innovations. It is necessary to determine an appropriate transitional period (upgrading the system requires additional resources and time);
3. The Commission should specify the data framework from the environmental and social aspect as newly defined areas for data collection;
4. The weak content of the proposed regulation in terms of the scope and set of data as well as the fact that the CAP requires digitized data represents a deficient basis on which the MS could assess the financial consequences addressed by proposed regulation.