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From: General Secretariat of the Council

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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 Lithuanian delegation

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

Lithuania's written comments on the Proposal for a Regulation of the European Parliament and of the Council amending Council Regulation (EC) 1217/2009 as regards for the Farm Accountancy Data Network into a Farm Sustainability Data Network

Lithuania supports the intention to convert the Farm Accountancy Data Network (FADN) into a Farm Sustainability Data Network (FSDN). However, Lithuania would like to propose some improvements to the Proposal:

Preamble, point 8

Liaison agency makes contract with accountancy offices for receiving farm primary data from them, data use, protection etc. Liaison agencies do not have direct links to farmers, therefore, they cannot assure farmers on things written above. Namely accountancy offices make contracts with farmers and give them assurance.

Preamble, point 13

It is suggested a very positive step towards reliability, quality and successful implementation of the new system. FADN systems were mainly developed in Liaison agencies of the member states. The new system FSDN will also be modernised / updated / rebuilt in these institutions.

We should not forget that scope of work to be done by Liaison Agencies will increase significantly:

1) at the same time the FADN system will be continued as well as the FSDN – designed and built up.

2) special surveys launched by EU would be additional burden to Liaison Agencies starting from clarification of indicators, selection data collectors in the appropriate institutions, training of them, saying nothing about huge amount of job for IT staff.

The Liaison Agencies have either own system development groups including IT specialists, or they hire appropriate companies. Quality of primary data collected by data collectors a lot depends on checks and other functions (very well described in article 4(3)) incorporated and developed at the national FADN/FSDN systems. The better quality of data the more reliable EU RICA1 system. On the contrary to the point 13 of the Preamble, article 19 (2) declares that “Costs in respect of the setting up and operation of the National Committee, Regional Committees and liaison agencies shall not be included in the general budget of the Union”. This misunderstanding should be solved in favour of liaison agencies.

Article 7, paragraph 1 (e)

It seems that we have in mind a simple process. In reality, the situation is different. In the process of verification in order to achieve duly completed FR, Liaison agencies make a lot of job to check and correct (with assistance of data collectors) the errors left, inaccuracies etc., especially in case of complex checks among the tables. It is important to stress that Liaison Agency also participate in the primary data corrections. This statement might be extended, for example:

“to verify that the farm returns have been duly completed and, in case of need, to correct the errors or inaccuracies appeared with assistance of data collectors”;

Article 7, paragraph 1 (h)

The same remark as for Preamble, point 8: Liaison agency in most cases do not have any direct links to farmers.

Article 19 paragraph 1 (b)

What is the difference between (a) and (b)?

Article 19 paragraph 2

Contradiction with Preamble, point 13.

Article 19 paragraph 3

Liaison agencies not only will be included into this job but will play a key role, however, article 19 (2) prohibits to pay to this institution.

Article 19 paragraph 4

It is a question mark if it is reasonable to use standard output value as criteria for this purpose. Huge cereal or orchard farms will require less job compared to smaller farms with livestock or horticulture ones.

