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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 Estonian delegation

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

**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
{COM(2022) 296 final}**

Estonia has analyse reservation. We support the proposal with initial comments as following:

1. As member states will need to provide data to the Commission as from 2026 (for the 2025 accounting year) and the details of added data needs will be described mainly in implementing acts, there is need to share the proposals of implementing acts as soon as possible. The initial estimation indicates that number of new variables would be in between 5 to 25. The level of additional costs depend on details. For example how many items will be added (all together or step by step). The level of EU standard fee and the financing of the development cost should be proportional to additional costs - not only once, but based on actual needs. There could be also indirect cost for other database development to respond to needs of FSDN. How big will be the share of EU financing of develop costs and clarification what should be included is needed. The share of EU (30%) for data collection cost is low. The FSDN data is important for analysing CAP.
2. We support the re-use of already available data in other databases and sources, but we ask to clarify “other databases and sources”. How the FSDN regulation is connected with SAIO or CAP regulations. These are the main regulations based on which already existing agricultural data is collected. There is need for harmonisation of definitions of FSDN items with other agricultural statistical data (for example fertilizers, plant protection products). For example we have started e-field book project, where the data will be collected from producers who apply for CAP support.
3. Technical remark – use throughout the text wording “holding”, not “holding or farm”.

4. It is also important to show clear connection with main agricultural statistics and FSDN regulations to provide the smooth mutual data change (individual data). Based on the statistics rules the individual data could be given only if data provider gives the written consent.
 5. We support the mandatory data submission for agricultural holding qualifying as returning holding in the selection plan. We would like to know how the selection plan should take into account the environmental and social representativeness.
 6. There is need clearer description how the EU level farm ID will be implemented. We see that there should be connection with business codes in member states. It is important that on EU level the farm ID generation and use the confidentiality and protection of data is followed. We suppose that the EU level farm ID should be given only for those which provide data based on now valid regulation.
 7. We find that the share of decrease the standard fee is not proportional. We support bonus system for data quality and early providing and the valid standard fee decreasing share of 20% if the provided data covers less than 80% of selection plan.
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