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European Union

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| From:          | General Secretariat of the Council   |
| To:            | Delegations  |
| No. Cion doc.: | 10592/22 + ADD 1-2   |
| 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<br>- Comments from the Dutch delegation |

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

**AGRIFIN 12 October – agenda item 6** *Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EC) No 1217/2009 as regards conversion of the Farm Accountancy Data Network into a Farm Sustainability Data Network.*

- **Article 2:** With regard to article 2 sub j, the Farm-ID, we support the concerns that are raised by other MS (Austria, Finland, Denmark). It is not clear how this ID can contribute to better policymaking and -evaluation. And if providing farm ID, FSDN will only provide farm ID for a sample – and is it the intention that farm ID only will be used for data sharing for the sample provided, or do COM intend to have a census in the future in order to combine data with these sources ?
- **Article 4:** We support the point raised by Denmark and Finland that the Council Working Group and the Presidency should work further on these provisions in order to specify the delegation of power to the Commission or make the provisions more precise and introduce proper safeguards in order to make transparency for member states on future burdens and costs.
- **Article 4.4.:** we support the redrafting of Denmark and Finland of article 4 paragraph 4 on common and special surveys and we support the introduction of a new paragraph on feasibility studies.
- **Art.5:** Also we still doubt whether an obligation for farmers to answer to the FSDN-survey is necessary and proportional. We echo the questions raised by Germany on the selection plan.
- With regard to **Article 7, para (h)**, we have the following suggestion for redrafting the text based on the suggestion of Poland: “ensuring that farmers have access to feedback on the results obtained”