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#### **WORKING DOCUMENT**

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 - Comments from the Slovenian delegation

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

**ADDITIONAL SLOVENIAN COMMENTS**

ON THE FSDN PROPOSAL (DEADLINE 29 SEPTEMBER 2022)

1. The proposed amendments to Regulation 1217/2009 give the Commission the power, by means of delegated acts, to lay down rules on the identification of the main groups of data to be collected and the general rules for data collection (Article 8) and the general rules on data management and data processing and data protection (Article 4). Delegated acts may supplement or amend non-essential elements of a legislative act and, in the cases (Article 4, Article 8), they are essential elements of Regulation 1217/2009. It is important for Slovenia to have sufficient time to implement and adapt national legislation, and we therefore propose that content (Article 4, Article 8) shall be properly regulated by a basic or implementing act and that the delegated act should also provide an appropriate transitional period for implementation. This is very needed because MS can not estimate the risks and costs in the process of collection new environmental and social data at farm level, which are not specified, and of the establishment of a unique farm identification code.
2. Slovenia proposes that member states in general should have 3 years to establish the necessary conditions to comply with all obligations.
3. Regarding ARTICLE 2(b) the definition “HOLDING” proposed by the commission seems very unclear and Slovenia would ask to consider the definition in the IFS Regulation seems more relevant to apply in this regulation. Slovenia therefore propose that for the definition of the holding can be used the same definition of holding as defined in Regulation (EU) 2018/1091 of the European Parliament and of the Council on integrated statistics at farm level and of the divisive Regulations (EC) No 1166/2008 in (EU) No 1337/2011.

4. The use of FarmID in Slovenia follows that, despite the possible introduction of a 'unique farm identification code' in the IFS, its use from that statistical survey will not be possible outside the statistical system or for administrative purposes, for instance to link FSDN data with the IFS for the purposes of Regulation 1217/2009. Slovenia supports the introduction of a 'unique farm identification code' in the FSDN and IFS, but unfortunately the introduction of this identifier will only allow the integration of IFS and FSDN data for statistical purposes (national or Eurostat level) and not for the purposes of Regulation (EC) No 1217/2009.
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