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From: General Secretariat of the Council

To: Delegations

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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 Belgian delegation

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

FSDN Proposal : Chapter I: Articles 1, 2, 2a, and 3 and on Chapter II: Articles 4, 5, 5a, 5b, 6 and 7
Comments from Belgium.

General Comment

It would be wise to indicate in the regulations, in compliance with the GDPR, that accounting offices can directly solicit customers/suppliers of RICA farms to facilitate the collection of accounting or technical information.

Comments of Article

Article 4 § 2

Belgium supports the comment “The COM shall not be empowered to adopt delegated acts on how member states do their data storage, establish own validation rules, use of data, access to primary data, processing primary data, combination of data with other data source, procedures for ensuring availability of data, obligations for end users of scientific data and other interested parties without any safeguards for the member states in order to reduce the burden and costs for respondents and member states”

Article 4 § 3

Belgium joins the request “ The question of what “the procedure in case of refusal to provide data” relates to the provision of data by MS or the individual establishment?

Article 5 ter

There is no consensus to identify and value other gainful activities in the typology. current, the typology is calculated from physical quantities and a coefficient which is applied to them. For OGAs, there is no relevant physical quantity and it is therefore impossible to value them via a coefficient. OGA's reference should be deleted in Article 5 ter