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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 Dutch delegation

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

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.

- In general, we welcome the proposal for a Farm Sustainability Data Network. The combination of the three dimensions of sustainability (economic, social and environmental) can contribute to a better policy analysis for a sustainable and economically viable agricultural sector.

Overall we have some comments and questions on the current proposal:

- The introduction of a 'Farm ID' is a concern for the Netherlands. It is beforehand not sufficiently clear whether such a link is technically feasible. For example, a farm in the FADN-sample can have a different definition of entity than in the IACS-database.
It has not been motivated how this ID can contribute to better policymaking and -evaluation. The number of sample farms in the FADN is very small compared to the number of farms in the IACS and the IFS. For example, the Dutch FADN-sample consists of 1.500 farms, while the total number of farms is around 52.000 in the Netherlands. Establishing a link between the different systems delivers only additional information on a small selection of farms in the FADN-sample.
- Next to that, we would like a more clear definition of 'special surveys'. With the IFS and also the new SAIO-regulation there are already a lot of possibilities to gather (ad-hoc and periodic) information in the agricultural sector. The ad-hoc collection of data seems to fit the structure of the FADN less. Also the administrative burden for the farmers and the liaison agencies will increase if special surveys should be carried out.

- Also we doubt whether an obligation for farmers to answer to the FSDN-survey is necessary and proportional. The data network works at this moment effectively in Netherlands without this obligation. In the proposal this obligation is on the one hand motivated by the fact that new social- and sustainability data could reduce the willingness of farmers to participate in the FSDN. On the other hand, it is motivated in the regulation itself that not future, but current problems with data collection are the reason for the introduction of the obligation. So it seems unclear what the motivation for the obligation is.

The original regulation relied on the voluntary participation by farmers and farm accountancy offices, arguing that this contributes to the quality of the data.
