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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 Greek delegation

Delegations will find attached the comments of the Greek delegation in relation to WK 17865 2022 INIT in view of the meeting of the AGRIFIN Working Party of 13 January 2023.

EL Answers regarding: 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

- Questions by the incoming SE Presidency

Question1. Scope of sustainability in relation to delegation of power and farm level data

Economic sustainability

Answer: The expansion of aspects related to income from other non-farm profitable activities is not desirable because they are not directly related to farm income.

Environmental sustainability

Answer: Environmental sustainability data at parcel level would require a completely different format and coding than current structure. Specifically in our country, the requested level of detail (parcel) with the huge fragmentation of agricultural land cannot be satisfied by the existing data capture-recording structures. It may be possible to collect data by existing crop code at farm level so that changes to the farm return can be implemented in the data collection information systems. But, even this level of detail is extremely doubtful if it can be achieved. Correspondingly, in livestock, what will be the corresponding level of detail?

Social sustainability

Answer: Given that social sustainability has many dimensions, we consider that this subject concerns other scientific sectors (health, social welfare, etc.) and it is not possible to record it in the context of the FSDN.

Question2. Input harmonization

Answer: We consider that there are no aspects of input harmonization and Member States should choose the most suitable way of collecting data for their country because it is often seen as strength of the survey.

Question3. Access to registered data

Answer: As it is not clear to us how this connection between other data sources and FSDN through Farm ID will be achieved / designed, we cannot assess whether the proposed amendments will enable our country's liaison agency to access its administrative and/or other registers for the purposes of FSDN.

Question4. The purpose of advice

Answer: Existing agricultural advisory tools have been used in several countries for at least a decade, taking into account a multitude of parameters. We propose to start as an advisory tool for the participants, in FSDN sample, while also being a motivation for them. It then will be able to be extended to benefit all EU farms and therefore to be considered a general advisory tool. It could function both ways meaning as an advertising tool (general advisory) with maybe limited features and a motivation tool (tailored for FADN participants) with extended features.
