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#### WORKING DOCUMENT

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 Romanian delegation

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

**WP AGRIFIN 13 January 2023**

**Romanian answers to the SE Presidency questionnaire**

**During the FADN Committee and Expert Groups meetings many Member States expressed their reserves and expressed or supported the view that the additional information such environmental and social sustainability should be voluntary to report, at least in the first years of implementation. They were also restrained regarding the increase of the possibility to cross-link other data sources to FSDN.**

**Question 1. Scope of sustainability in relation to delegation of power and farm level data**

**Economic sustainability**

***Question to delegations:** In your opinion, should income related aspects be limited to agricultural production and farm related activities (other gainful activities directly related to the farm) like in the current FADN, or should they be expanded to also include other business and incomes not related to agricultural activities?*

**RO:** We consider that it is **not** necessary to include additional information on other businesses and incomes that are not related to agricultural activities, as it would complicate the data collection process.

In Romania, farmers are reluctant to provide additional information.

**Environmental sustainability**

***Question to delegations:** How should environmental sustainability data be framed in the current proposal?*

**RO:** The information regarding environmental sustainability is very important, but it is difficult to obtain as we do not have the possibility to collect detailed data at the plot level, but only general information like Yes/No type, that does not involve too much the farmer's contribution.

## Social sustainability

**Question to delegations:** *In your opinion, how should social sustainability be framed within the current proposal? What topics should be included and what topics are considered as not being relevant for FSDN?*

**RO:** We find this kind of information difficult to collect that implies that the data collector must also have a specialized qualification.

### Question 2. Input harmonization

**Question to delegations:** *Do you consider that some aspects of input harmonization should be in the regulation, and if so, which would be those aspects?*

**RO:** We consider that it is **not** necessary to include in the regulation the aspects regarding the input harmonization.

### Question 3. Access to registered data

To reduce the administrative burden for both farmers and data collectors, the Commission proposes to increase the possibility to cross-link other data sources to FSDN. As such, The Explanatory Memorandum mentions the Integrated Administration and Control System (IACS) and the Data for Monitoring and Evaluation (DME) as examples of such sources. Access to registers by liaison agencies are also needed to provide linking information.

**Question to delegations:** *Do the proposed amendments make it possible for the liaisons agencies in your countries to access administrative registers and other registers for the purposes of FSDN?*

**RO:** Our Liaisons Agency does not have the possibility to access data from other administrative registers. Although some information needed for the FADN farm return can be found in other databases, there is no possibility to identify the farms due to the lack of a unique identification code.

#### Question 4. The purpose of advice

##### Questions to delegations:

*1. Do you consider FSDN should be seen as a general tool for advice and therefore that an advisory purpose should be a part of the general aim of the regulation?*

**RO: Yes**, the FSDN should be seen as a general tool for advice and an advisory purpose should be a part of the general aim of the regulation.

*2. If the advisory element should focus on the farms participating in FSDN, should the advice be seen as:*

*a) Part of an incentive scheme to contribute information to FSDN?*

*b) An advisory scheme where participating farmers not only sign up to contribute information to FSDN but also sign up to get extended advice in some way?*

**RO:** The advisory element should be an advisory scheme where participating farmers not just sign up to contribute with information to the FSDN, but also sign up to get extended advice in some way.

We consider that this may contribute to the improvement of the advisory services. Through this new data collection, it will be possible to compare the performance of agricultural holdings and provide farmers with personalised advice and guidance. This will improve the sustainability of farmers, including their incomes, in line with the objectives of the Common Agricultural Policy, the Green Deal, the Farm to Fork Strategy and the Biodiversity Strategy.