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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 Latvian delegation

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

Questions regarding the overall scope of FSDN

In response to the questions of the WK 17865 2022 INIT by 13 January for the next AGRIFIN Working Party meeting, the Latvian Delegation gives the following answers:

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?

Latvia:

We do not support the expansion to other businesses and incomes that are not related to agricultural activities, as this would increase the administrative burden and there is a risk to lose respondents.

Environmental sustainability

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

Latvia:

In order to answer correctly the question, more clarity is needed on the indicators required by FSDN.

Currently there are several Regulations in the drafting process, which will oblige farmers to collect various types of information at the rural level. For example, Commission Implementing Regulation as regards the content and format of the records of plant protection products to be kept by professional users pursuant to Regulation (EC) No 1107/2009 of the European Parliament and of the Council, Regulation of the European Parliament and of the Council on the sustainable use of plant protection products and amending Regulation (EU) 2021/211. It is also necessary to assess what kind of data reporting is mandated by the SAIO regulation.

Before deciding on the inclusion of any environmental sustainability data in the FSDN, it is necessary to evaluate whether farmers are not already obliged to report the specific data to the state authorities.

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?

Latvia:

Before including detailed criteria of social sustainability in the specific proposal, it would be necessary to evaluate for what exact purposes specific indicators could be used. At the same time, it should be assessed so that the inclusion of such specific criteria of social sustainability in the surveys does not create a disproportionate administrative burden for the respondents.

In connection with the evaluation of the CAP SP, it could be evaluated, for example, how the number of young farmers increases, the change of generations, how the employment and participation of women in agriculture improves, employment (uses local labor force, from other regions or guest workers) etc.

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?

Latvia:

We believe that the choice should be left to the Member States on the most appropriate way of data collection. This should not be strictly specified in the Regulation.

Question 3. Access to registered data

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?

Latvia:

There are no problems to access the existing registers in order to obtain the data already stored in other existing state registers in Latvia.

Question 4. The purpose of advice

Questions to delegations:

In recitals 3 and 4 of the proposal it is stated that FSDN should contribute to the improvement of advisory services to farmers and benchmarking of farm performance. The text in recital 13 and in article 7(h) of the proposal encourages tailored advice and benchmark reports for participating holdings.

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?

The proposal encourages tailored advice but statistical analyses of farm performance could also be focused on correlations and best practices etc. That could be used as an input for advisory packages and advisory services benefitting all farms in EU.

Latvia:

Latvia agrees on the proposed wording of Subsection h of Article 7.

Currently Latvia prepares individually adapted comparative reports for its FADN farms.

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?

Latvia:

We consider that the advice should be seen as part of an incentive scheme to contribute information to FSDN.
