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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 Slovak delegation

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

ANNEX

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

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?

According to our opinion, the main aim of the data collection should be to provide a comprehensive overview of expenditures and incomes of an agricultural holding. We therefore think that data should be collected on all farm incomes and be broken down into various categories of agricultural as well as other farm-related activities. Agricultural activities may include, for example, sale of agricultural commodities, sale of own-produced food products, incomes from agro-tourism, rental of agricultural equipment, etc. Other activities may include, for example, provision of repair, construction or catering services and others.

How should environmental sustainability data be framed in the current proposal?

Before providing any framework, it is necessary to firstly define the environmental variables and determine sources, from which these data will be collected. It is important to underline that the more detailed information we require, the more difficult it will be to obtain relevant data. Therefore, we should not run the risk of discouraging farmers to participate in FSDN. There is also the question of how to verify the correctness of data.

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?

When framing the social sustainability within the current proposal, we suggest to focus on the employees and farm owners/managers. Data should be collected at farm level. Attention could also be paid to women and youth.

Question 2. Input harmonization

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

We share the view that only outputs should be harmonized at FSDN level. To start with, we suggest to firstly define the general idea of outputs.

Question 3. Access to registered data

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?

We welcome the idea of reducing the administrative burden for both farmers and data collectors by cross-linking data sources. In Slovakia, however, no other data sources were used in the collection of FADN data in the 2021 accounting year. The FADN data were collected directly from reporting agents who used the web application developed for this purpose. That being said, for the collection of FSDN data, we do not currently have access to administrative or other registers.

Question 4. The purpose of advice

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?

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?

We do not consider FDSN to be an advisory tool. It would be difficult for the liaison agency in Slovakia to provide advice based on the individual FSDN data to farms and other companies. We understand the idea behind, but in Slovakia it would be difficult to implement it in practice.