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## **WORKING DOCUMENT**

From:	General Secretariat of the Council
To:	Delegations
No. Cion doc.:	10592/22 + ADD 1-2
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 French delegation

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

**Objet :**Comments of the French authorities on FSDN (answers to the questions provided in the WK 17865 2022)

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## **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?*

Answer: The addition of data on other activities and non-farming income would make it possible to explore some very interesting questions. However, it would lead to an excessive burden on the collect. It is important to take into account the administrative and financial burden in statistical systems: a single system - in this case the FADN/FSDN - cannot allow all issues to be studied. France is therefore not in favour of extending the FADN/FSDN to other activities and to income not linked to agricultural activities. Such an extension could possibly be envisaged if the data are not collected but come from a pairing with other sources, not necessarily being supplemented each year.

### **Environmental sustainability**

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

Answer: As for the previous question, France considers that the addition of new information to the FADN/FSDN should always be done with a view to not overburdening the collect. Environmental data at parcel level could be relevant for the analysis, but cannot be collected directly by the FADN/FSDN without overloading the administration and the respondents, in this case the farmers.

## 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?*

Answer: The evaluation of social sustainability is already possible with the current FADN on certain aspects (age and level of training of farmers, permanent or temporary nature of jobs). It seems difficult, without adding too many variables, to go further in the assessment of social sustainability. The addition of questions on working conditions (e.g. safety) could possibly be part of the social sustainability framework assessed in the FSDN.

## 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?*

Answer: For France, there is no reason to review the degree of harmonisation with the current FADN and input harmonisation does not seem necessary.

## 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?*

Answer: IACS data are already used in the current French FADN collection thanks to a farm identifier that exists in both sources ("PACAGE" number). Monitoring and evaluation data could probably also be used, also by matching with the FADN/FSDN. For other data sources that could be matched with FADN/FSDN, the proposed changes allow a priori for matching. However, the issue is to ensure that sources outside the FADN/FSDN can include a common farmer identifier with the FADN/FSDN, but this cannot be covered by the FADN/FSDN Regulation.

#### 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?*

Answer: For France, advice should not be part of the general objective of the regulation. This provision should remain voluntary and not mandatory.

*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?*

Answer: France doubts that advice can be a sufficient solution to the risks of refusal to respond to the FADN (especially if the questionnaire becomes too heavy with the new FSDN). Moreover, having only farms interested in advice among the respondents to the FADN would introduce a very damaging statistical bias.

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