



Council of the
European Union

Brussels, 19 January 2023
(OR. en)

**Interinstitutional File:
2022/0192(COD)**

**5212/23
ADD 16**

LIMITE

**AGRI 6
AGRIFIN 2
CODEC 22**

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 Irish delegation

Delegations will find attached the comments of the Irish delegation in relation to WK 17865 2022 INIT.

Extract from document **WK 17865/2022 INIT**

- Questions by the incoming SE Presidency

Responses from Ireland

Questions regarding the overall scope of FSDN

The presidency has taken note of the comments from delegations already made regarding the articles of this proposal. However we would like to continue the discussion with some aspects that are important for the consistency of our further work with the file.

We also aim to start a discussion on the overall framing of the scope of the delegated acts.

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

Economic sustainability

Current article 1(3) of Regulation (EC) 1217/2009 stipulates that data obtained in the framework of the FADN serve as a basis for agriculture, agricultural markets and farm income analyses.

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?

Response:

We would be in favour of the collection of data on other income sources, certainly with respect to employment income in respect of the farmer.

Aside from it giving us a better understanding of the income coming into the household, we think that the off farm income of the farmer is an important consideration with respect to how farmers might choose to manage their time and could influence the number of hours farmers are willing to spend as farming.

Environmental sustainability

Environmental sustainability may require detailed information to accomplish analyses. In the new proposal for a FSDN, data is collected at farm level but the need for analyses sometimes goes beyond that. An example in this sense could be the detailed information at parcel level related to soil conditions, pesticides and farming practices.

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

Response:

We would agree that FSDN should relate primarily to farm level data but parcel information would be important for a limited number of indicators. Parcel scale is important for the Land Use and Land Use Change (LULUCF) component of emissions modelling. Especially in an arable based system where there is crop rotation and land use is changing regularly at parcel scale. In the inventories a move from grass to arable leads to increased emissions and vice versa for arable to grass. Access to temporal LPIS data would sort this out.

Social sustainability

Social sustainability has many dimensions. On the one hand, it could be related to the quality of life of the farmer/manager, on the other hand it can involve aspects related to safety, health and quality of life of all employees of the farm. Social sustainability in a wider sense could also include social interactions beyond the farm like for example interactions in local networks and interactions with family and friends.

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?

Response:

Q. 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?

Given the broad range of topics relevant to the social dimension of agricultural sustainability is not feasible to collect all of the data required for the calculation of suitable metrics in the short term.

The Irish Food Vision 2030 document has placed a particular focus on the collection of social sustainability data pertaining to the following issues: generational renewal, gender balance, education and training, health and safety, mental health and wellbeing and broader rural development. The latter can relate to connectivity, isolation, resilience and the need to ensure a socially just transition within a sustainable food system. In relation to these issues in particular, some data already exists within FADN. For example - data on the **educational and training** qualifications of farm operators and workers is also important in terms of the sustainability and resilience of farms.

Additional data pertaining to **farm succession** and the characteristics of potential successors would be helpful. The role of women on farms and progress towards achieving improved **gender balance** in the management and operation of farms should also be tracked. Data on **farmer health and wellbeing** is an area not currently well captured in the FADN and is central to a more holistic measurement of social sustainability. Guidance can be taken here from the OECD better life index which includes data on work life balance, life satisfaction, civic engagement and health <https://www.oecdbetterlifeindex.org/#/111111111111>. Data on **antibiotic sales and use** is another important element of social sustainability measurement however the collection of sufficient data within the current framework of the FADN would be challenging. The utilisation and integration of other existing data sources in this regard should be explored. Failing that, the collection of relevant data through a pilot study is worth considering.

Question 2. Input harmonization

Recital 11 and article 4(3) of the current proposal stipulate the empowerment for the Commission to adopt delegated acts that affect the gathering, storage and processing of data. The Explanatory Memorandum mentions that it will be up to the Member states to choose the most suitable way of collecting data, something that is often seen as a strength of the survey. At previous working parties, many member states expressed the view that the output and not the input, should be harmonized at FSDN level. At the same time, some input harmonization could help to ensure the output.

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?

Response:

Input harmonization would be exceptionally difficult. Data input systems have been developed over many years by member states and have been tailored to meet their own specific needs and environments. In many members states researchers use the data and the panel aspect of the data is very important for much of that work.

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?

Response:

The access to registered data is key to reducing response burden on the farmer and improving data quality. The idea of having a unique farm Id across EU member states that would be used for FSDN and then used by IACS and also used for the data collection under the Integrated Farm Statistics regulation is unlikely to be feasible due to data protection legislation. We would envisage that this data access would be better facilitated at the member state level.

Question 4. The purpose of advice

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.

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?

Response:

We would slightly wary of provision of specific farm advice to farmers in FADN. In experimental terms this is a form of treatment and could compromise the ability to use the sample for boarder research purposes. Farmers in receipt of free advice might become less representative of the cohort they are selected to represent, if otherwise they wouldn't choose to receive advice.

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.

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?

Response: Due to the position we would hold on the previous question we wouldn't be in favour of this.

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?

Response:

Due to the position we would hold on the previous question we wouldn't be in favour of this.
