



Council of the  
European Union

Brussels, 23 January 2023  
(OR. en)

---

---

Interinstitutional File:  
2022/0192(COD)

---

---

5212/23  
ADD 17

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<br>- Comments from the Slovenian delegation |

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

**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?

SI answer: Income related aspects should be limited to agricultural production and farm related activities. Such approach is in line with the objectives of article 6 of the directive on strategic plans.

Providing other business income data should remain voluntary for the farmers to provide, as we believe that making it obligatory will decrease the willingness of farmers to participate.

**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?

SI answer: The collection of the environmental data should be limited to the level of farms and limited to the scope of data to those that are available within the framework of monitoring the implementation of the CAP. This will significantly reduce the administrative burden for the reporting farms.

At a later stage, when it becomes clearer how data at a more disaggregated level (plots, etc... ) could even be used to evaluate and assess the sustainability of farms, and when these systems "mature" these data may be also included.

### **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?

SI answer: SI thinks that social data collection should be limited to areas of safety at work, health, worker's rights, education, and renewal.

As part of the implementation of the CAP, the implementation of "social conditionality" will be foreseen from 2025, which can be considered as a good basis for collecting data in this area.

## 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?

SI answer:

The power to adopt delegated acts supplementing this Regulation with rules on data collection, storage and processing is very broad.

In principle, we could support the establishment of common rules in certain cases, especially when this is important for ensuring the quality of the collected data and interoperability.

In order to protect personal data, the establishment of common rules regarding the use of particularly detailed data should be more clearly defined in the basic regulation.

Regarding the management of IDs of farms, SI reiterates certain concerns regarding its wider use, especially by the EC. A uniform ID seems to only make sense in the way that it enables the connection of databases at the national level and thus facilitates the collection of data for the reporting farm.

## 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?

SI answer:

SI supports the possibility of enabling the use of data from other databases, such as the IAKS and the monitoring and evaluation system, in order to reduce administrative burdens. MS should have this option when collecting basic data for individual farms.

SI already has an established uniform identification number - i.e. agricultural holding number. The latter would enable data to be supplemented. However, it would take a lot of additional work to connect these databases in such a way that automatic data transfer/use could be ensured.

The question whether the proposed wording in point 13 (Article 7, subparagraph d) is sufficient as a legal basis for such access, is still being scrutinized.

#### **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?

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?
- 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?

SI answer: SI agrees that the collection of data on farm sustainability presents an opportunity to simultaneously provide tailored advisory services and feedback to farmers

We believe that this is particularly interesting for farms participating in the collection system. This can also be a good incentive for farmers to cooperate in the system. Undoubtedly, the results can also be used in consulting services on a wider scale.

For SI it is important to maintain a voluntary approach and take into account existing national regulations. In our opinion, the introduction of a single system at the EU level is not appropriate, because the advisory systems and approaches differ too much among the Member States.