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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 Czech delegation

Delegations will find attached the comments of the Czech 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

Please, find below answers on behalf of the Czech Republic.

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?

Answer: In our opinion, the aspects of farm income should not be expanded to include also off-farm income, such as wages from other jobs (of farm employees). However, we would support widening the scope of OGA to include activities that are not currently considered OGA. This may include, for example freight transportation, machinery repairs or construction works carried out by farm employees.

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?

Answer: If it would be possible to link FSDN to IACS, some variables could be followed in a more detailed structure. However, the primary objective and focus of FSDN should be on collecting data at the farm level.

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?

Answer: Only data that can be expressed at the farm level should be collected, not those at the level of individual employees. For example, we consider data on well-being at the workplace, available services (health, social), educational/training opportunities etc. to be relevant. On the other hand, we find irrelevant any data related to agricultural business that could be considered sensitive. Any potential social indicators to be monitored should relate to the farm as a whole and not to individual farm workers.

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?

Answer: The conditions and possibilities vary in Member States, in our opinion, it is therefore not possible to harmonise the way data is collected, stored or processed.

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?

Answer: We would welcome the possibilities of wider access to administrative registers. We would like to see this issue emphasized more in the regulation.

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.

Answer: FSDN should not be seen as a general advisory tool. Moreover, the question arises whether the Liaison Agencies would have sufficient resources to provide advisory services.

2. If the advisory element should focus on the farms participating in FSDN, should the advice be seen as:

1. Part of an incentive scheme to contribute information to FSDN?
2. 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: Part of an incentive scheme to contribute information to FSDN.
