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From:	General Secretariat of the Council
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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 Estonian delegation

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

REGULATION OF THE EUROPEAN PARLIAMENT AND THE COUNCIL

amending Council Regulation (EC) No 1217/2009 as regards conversion of the Farm Accountancy Data Network into a Farm Sustainability Data Network

Date	Member State
12/01/2023	Estonia

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: Estonia prefers the current FADN approach. We understand the need to get information about non-agricultural income, but in Estonia it is possible to get such data about companies, but not about income related to a natural person.

Environmental sustainability

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

Answer: If the goal is to relate the economic results to the goals related to environmental protection, the sample should be representative in terms of the corresponding indicators. Currently, representativeness is ensured only in terms of economic indicators. The total amount of emissions from the country's agriculture, the total use of plant protection products or fertilizers should come from other registers on the basis of the total population. The doubt is also related to excessive detail, because the amount of data on soil properties, pesticide use and agrotechnology at the level of parcels is very large, and it is difficult to generalize this data.

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: Social sustainability should be in the basic act named by topics. The following topics could be considered: youth and the change of generations, education of farmers, use of advisory services, cooperation. Issues of quality of life and health are rather topics of other policy areas.

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: Standardization of classifiers and definitions is necessary to ensure data quality. FSDN should be able to use other data collected on the basis of EU regulations.

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: We need a legislative basis to receive individual data from databases created on the basis of EU regulations and from the Statistical Office. Currently, in Estonia, for example, it is possible to receive data from the CAP implementing agency, but not from the Statistical Office.

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: We support the idea that FSDN data can be used for advice more widely. In Estonia currently, the farms included in the sample receive feedback based on their data and comparisons with the results of a group of farmers similar in terms of economic size and production type. The rest of the farmers have the opportunity to use public data. The provision of advice assumes that the farmer wants advice, so FSDN should remain an option. It is necessary to consider the possibilities of sharing individual data with the advisory service provider with the farmer's consent.

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: Rather, to provide advice to all farmers who want it and to encourage the advisory service to make more use of FADN/FSDN data.
