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#### WORKING DOCUMENT

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 Belgian delegation

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

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 Belgian delegation

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

**How should environmental sustainability data be framed in the current proposal?**

*The level of environmental data collection should be the farm or agricultural activity. Registration by plot is not relevant.*

*Data on purchase, sale or service can be easily recorded in quantity and value if the accounting documents are well detailed. It may be useful to delineate a number of segments on which to collect data. The variables that can be found on the accounting documents can be related to energy, water, crop protection products and fertilizers. It seems logical to focus on this initially as there is a strong link to the current FADN.*

*On the other hand, variables related to technical practices (irrigation, tillage, spreading methods, etc.) should be collected using a defined choice questionnaire (yes/no, present/not present, less than 10%, between 10 and 50%, more than 50%). They should be included in the non-annual surveys*

**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?**

*The variables related to working conditions and training are very relevant.*

*Variables related to the well-being and living conditions of farmers should be included in another survey or at another level than the FSDN (e.g. FSS)*

## **Question 2. Input harmonization**

**Do you consider that some aspects of input harmonization should be in the regulation, and if so, which would be those aspects?**

*Harmonization of inputs is a very broad topic. It should be done at the level of implementing acts.*

## **Question 3. Access to registered data**

**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?**

*No. Because each database was created to meet a specific need (payment, control, health monitoring, etc.) and therefore the nature of the identifier of a record is not the same.*

*Moreover, at Belgian level, all these databases are not under the jurisdiction of the same ministry or level of authority, so legal and technical cooperation agreement must be established.*

## **Question 4. The purpose of advice**

**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.

*The FSDN is an observatory, not an advisory body. Of course, based on the data collected, it is important to give farmers back a clear and concise report. Additionally, it is feasible to tell a farmer where his farm stands in relation to a group of similar farms in a similar environment.*

*Any other form of advice should be done by specific advisors according to the needs of the farmer. If this is done at the level of the FSDN, it is a new task that would be very costly in terms of time and money for the liaison agencies and their representatives to the farmers. In addition, private farm advisory services would see this as unfair competition.*

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

**Part of an incentive scheme to contribute information to FSDN?**

- a. 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?**

*A clear feedback report will further motivate farmers to participate in the FSDN*

*Other comments*

*Following the presentation of the variables by ECORYS on 22 November 2022, Belgium notes that the workload of operators and agents in contact with operators will be strongly impacted as soon as the data is taken from sources other than accounting sources.*

*Interviews, queries of private or public bodies' databases and, above all, the verification of these data for inclusion in the FSDN survey will generate a significant workload for the liaison agencies. The Commission's objectives are good, but if too much data is integrated into the FSDN, the risk is that the basic purpose of the FSDN will be lost.*