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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 Spanish delegation

Delegations will find attached the comments of the Spanish 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

As regard providing written answers to the questions to the WK 17865 2022 INIT by 13 January for next the AGRIFIN Working Party meeting, the Spanish Delegation reply to:

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

Income related aspects should be limited to agricultural production and farm related activities (other gainful activities directly related to the farm) like in the current FADN

Environmental sustainability

It should be framed at a crop/livestock category level.

Social sustainability

First of all, we would limit questions to holder/manager. Secondly, questions should be about workload, possibilities of substitution in case of a leave, feasibility of replacement for the future and more breakdown about training and awareness activities and background.

Question 2. Input harmonization

We agree with recital 11 and article 4(3). We consider any of these aspects as suitable for input harmonization.

Question 3. Access to registered data

Yes, we consider the proposed amendments make it possible for the liaisons agencies in our country to access administrative registers and other registers for the purposes of FSDN.

Question 4. The purpose of advice

1. Yes, we 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
 2. We consider a) the advice should be seen as part of an incentive scheme to contribute information to FSDN.
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