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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 Finnish delegation

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Delegations will find attached the comments by the Finnish delegation in relation to Presidency's proposed amendments (doc. 5861/23 REV 3).

**Written comments by the Finnish delegation on the Presidency drafting suggestions of 3 April 2023 regarding the proposal for a Regulation of the European Parliament and of the Council amending Regulation (EC) No 1217/2009 as regards conversion of the Farm Accountancy Data Network into a Farm Sustainability Data Network**

Finland thanks the Presidency for their sustained hard work in formulating the text and incorporating Member State comments into the latest version. With regard to the Presidency's compromise package provided via Delegates Portal on 3 April 2023, Finland would like to provide the following short comments.

Finland considers the text to be a clear step forward and feels that it does well to reflect the concerns raised by Member States in the working party discussions. Overall, no non-acceptable provisions are identified at this stage.

Finland also points out the following:

**Recital 5b**

The phrasing of recital 5b seems to not be in line with the latest compromise proposal, as well as the phrasing of for example recital 5c, in that it omits the possibility for the Member State to send the data to the Commission while handling the linkages at the national level. The proposed phrasing "Member States should provide linkage information to allow farm level identification..." should thus be updated to reflect the latest developments, and account also for situations where Member States handle the linking of information nationally and only transmit the linked data to the Commission, along with the FSDN number.