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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 by the Czech delegation in relation to Presidency's proposed amendments (doc. 5861/23 REV 3).

Below please find the comments of the Czech Republic regarding

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 - Presidency suggested amendments

(5861/3/23 REV 3)

Recitals

(4b)

We agree with the amendments – „are“ instead of „can be“ etc.

(4d), (4e)

We also agree with the amendments.

(4f)

We consider this as better clarified.

(5a)

We consider the amended wording appropriate.

(5b)

We support adding DME and IACS and further refinement of the text.

(5c)

We welcome better explanation of identifiers and links and enabling the linkage on the MSs' level.

(6a)

We support deleting „farm performance“ and also more clear description of the „aggregated data“.

We also support deletion of the part containing „personalized advisory services“.

(8a), (8b)

We support the amendments.

(10a)

We suggest and consider better usage of the word „shall be“ in the sentence

Any other usage of the individual data by the Member States or by the Commission, in particular for control or taxation purposes, **(should) shall be prohibited.**

(10b)

In the previous version the word „pseudonymized“ was omitted, now it appears in the text again and we do not fully understand the purpose or reasoning behind it.

(13)

We support the extension of the text regarding the budget.

(14)

We would like the part „**it should be possible for Member States to adopt national rules to address this issue.**“ to remain.

(15b)

We agree with changes.

Article 1

(2)

We welcome addition of „without adding new topics“.

Article 2

Amended definitions are more precise and clear, we support them.

Article 4

(2b)

We support adding the word „may“.

Article 4a

We consider the amendments OK.

We support addition of the part that the Commission shall take into account the feasibility of obtaining the data referred to in paragraph 2.

We also support the wording regarding the Commission prepares and makes available technical guidelines regarding collecting the relevant data, as this should help the liaison agencies.

Nevertheless, we believe that there should be a requirement for the same conditions and provisions for IACS data as for FSDN data enshrined and also regarding the "extraction" of data the requirement to verify that it is not only feasible to extract but that the data is also relevant for FSDN stated in the Articles 4a and 8(4)(a) respectively.

Article 7

We consider the amendments appropriate.

(h)

In our opinion this amended wording makes it more clear that the advisory is voluntary.

Article 8

(1a)

We welcome deletion of the part, as we considered it unclear what was meant by „other national identification numbers“.

Article 16

(3)

We support the deletion. FSDN data should not be used for other purposes.

Article 16a

We support the amendments.

Article 16b

We welcome the deletion of the „in their national law“ part, as we considered it unclear what was meant by that.

Article 19

(1a)

We welcome the deletion of the wording that the amount may be proportionate to the list of topics in the Annex II. And retaining 20 % of the possible reduction.

(3)

We support the clarification.

(6) We support adding the part „In the implementing act in relation to the contributions, the Commission shall make clear on the basis of which criteria these contributions will be allocated“.

We consider it appropriate that the sentence **„In the implementing act in relation to the contributions, the Commission shall make clear on the basis of which criteria these contributions will be allocated“** is added.
