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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 Slovak delegation

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

Comments and remarks of the Slovak Republic on the latest revised version of the draft regulation as regards the conversion of the Farm Accountancy Data Network into a Farm Sustainability Data Network (ST 5861/23 REV3)

First of all, we welcome that the proposal allows two possibilities for linking databases at the EU level (recitals 5b, 5c, article 4a). Slovakia is in favour of the option which allows to supplement the FSDN returns with the DME and IACS datasets by linking it via a unique identifier. The unique identifier will be included in the individual FSDN farm return and will also be included in the DME and IACS datasets. The FSDN return and datasets will be uploaded to the Commission's computer system and the Commission will prepare technical guidelines on the methodology.

We consider the recitals and articles concerning the handling of individual data, protection against disclosure or misuse and use for scientific purposes (recitals: 10a, 10b, 10c, 10d, 10g and articles: 16, 16a, 16b) as reasonable and we can support your text proposals.

When it comes to setting up costs (article 19), we agree with the proposed 20% reduction in the rate in case of non-delivery of at least 80% of the number of farms listed in the selection plan. We also agree with the reduction of the rate by 35% in the case when 80% of the farm returns listed in the plan have not been delivered in the previous two consecutive years.

We also have no objection for the Commission to lay down rules on storage, processing and reuse of data and we welcome that the participation in the FSDN data collection is voluntary.

Our main concern with the proposal is the excessive administrative burden that might be imposed to Member States. In the Annex II, only broad topics are known and the actual variables of the new FSDN return have not been specifically defined (to be specified only in the implementing regulation). Moreover, list of data to be extracted from DME and IACS databases is also not known (to be specified only in the implementing regulation). Since we do not know the number of new variables, we are worried about the administrative burden that might be imposed on us.

To conclude, Slovakia does not have any substantive comments on the draft regulation and we can support the text as it stands now. Our main concern is the administrative burden to be put on Member States by imposing new variables.

