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WORKING PAPER

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CONTRIBUTION

From:	General Secretariat of the Council
To:	Delegations
N° Cion doc.:	5865/21 + ADD1
Subject:	Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on statistics on agricultural input and output and repealing Regulations (EC) No 1165/2008, (EC) No 543/2009, (EC) No 1185/2009 and Council Directive 96/16/EC - Comments from the Dutch delegation

Delegations will find in annex comments from the Dutch delegation on the above-mentioned proposal.

Written consultation on the Proposal for a Regulation of the European Parliament and of the Council on statistics on agricultural input and output and repealing Regulations (EC) No 1165/2008, (EC) No 543/2009, (EC) No 1185/2009 and Council Directive 96/16/EC

2021/0020 (COD)

Member States are invited to comment on the proposal by **24 February 2021** and to send the replies to: LIFE.1@consilium.europa.eu and eu2021@ine.pt

MEMBER STATE: the Netherlands

GENERAL COMMENTS:

The Netherlands recognises the Union needs for high-quality and comparable European statistics to monitor and evaluate the common agriculture policy (CAP) and other Union-related policies. In general, the Netherlands welcomes the aim of the proposal. However, we cannot support it as it stands.

Please be informed that the comments provided in this document have been coordinated with a group of countries (CZ, DE, DK, ES, HU, IE, NL, PL, SI and AT¹) which share major concerns and have common positions on many important provisions of the Commission proposal.

The proposed Regulation is part of the Regulatory Fitness and Performance Programme (REFIT) of the Commission and should therefore contribute to simplification and regulatory burden reduction. Although the current proposal does indeed reduce overall statistical legislation, in the opinion of the Netherlands it falls short of reducing the reporting obligations for Member States. Furthermore, in this proposal we see the Commission acting in the opposite direction: data collection currently conducted on a voluntary basis and agreements are to be replaced by legislation, and added to this Member States will be obliged to provide the Commission with yearly instead of five-yearly statistical information about the use of plant-production products in agriculture. In this respect it should be noted that the availability of the source data remains a concern.

¹ AT supports the proposal with some exemptions.

It needs to be emphasised again that if data used for the statistics cannot be obtained from available administrative sources, but must be collected by surveys, the proposal will lead to an increase in the administrative burden. Subsequently, we also stress that streamlining should not lead to additional production costs for Member States and extra response burden for the agricultural sector. The Netherlands advocates that the requirements resulting from the proposal should preferably be neutral in terms of cost and burden, but should certainly not have an increasing effect.

Further, the present proposal gives a very wide margin of appreciation to the Commission without sufficient limitations and safeguards for Member States. In the view of the Netherlands, the empowerment conferred to the Commission should be strictly circumscribed and safeguards should be included in order to avoid an increase in response burden for the agriculture sector and higher production costs for Member States.

Moreover, the Netherlands cannot support conferring powers to the Commission - in terms of delegated acts - for an indeterminate period of time; they should be subject to a cyclical review on a five-yearly basis.

Before concluding, the Netherlands remains committed to working with other Member States and the Presidency, to find an acceptable compromise. Finally, the Netherlands reserves the right to change its position and to assess the results of the future negotiations on their own merits as well as to submit further opinions depending on the course of the negotiations. We also inform you that complementary comments might be presented when the proposal is discussed at the Council Working Party on Statistics.

Commission's proposal	Member State's amendments <i>(kindly copy CION's proposed text and amend using the track changes feature)</i>	Member State's comments
<p>THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,</p> <p>Having regard to the Treaty on the Functioning of the European Union, and in particular Article 338 (1) thereof,</p> <p>Having regard to the proposal from the European Commission,</p> <p>After transmission of the draft legislative act to the national parliaments,</p> <p>Acting in accordance with the ordinary legislative procedure,</p>		
<p>Whereas:</p>		
<p>(1) A statistical knowledge base is necessary to design, implement, monitor, evaluate and review policies related to agriculture in the Union, in particular the common agricultural policy ('CAP'), including rural development measures, as well as Union policies relating to, among</p>		

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other things, the environment, climate change, land use, regions, public health and the sustainable development goals of the United Nations.		
(2) The collection of statistical data, in particular on agricultural input and output, should aim, among other things, to inform the decision-making process with updated data to support the European Green Deal with the related 'farm to fork' and 'biodiversity' strategies and future CAP reforms.		
(3) High quality harmonised statistical data are important to assess the state and trends of agricultural input and output in the Union, the functioning of markets, and food security and to assess the sustainability as well as the environmental, economic and social impacts of Union and national policies. Those data include, but are not limited to, livestock and meat statistics, the production and use of eggs, and the		

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<p>production and use of milk and milk products. Statistics on the area, yield and production of arable crops, vegetables, various permanent crops and grasslands and commodity balances are also important. Increasingly, statistics on the sales and use of plant protection products and fertilisers are needed.</p>		
<p>(4) An international evaluation of agricultural statistics led to the creation of a global strategy to improve agricultural and rural statistics of the Food and Agriculture Organization of the United Nations that was endorsed by the United Nations Statistics Committee in 2010. European agricultural statistics should, where appropriate, follow the recommendations of that global strategy.</p>		
<p>(5) Regulation (EC) No 223/2009 of the European Parliament and of the Council ⁽²⁾ provides for a framework to</p>		

² Regulation (EC) No 223/2009 of the European Parliament and of the Council of 11 March 2009 on European statistics and repealing Regulation (EC, Euratom) No 1101/2008 of the European Parliament and of the Council on the transmission of data subject to statistical confidentiality to the Statistical Office of

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develop, produce and disseminate European statistics based on common statistical principles. Regulation (EC) No 223/2009 establishes quality criteria and refers to the need to minimise the response burden on survey respondents and to contribute to the more general objective of reducing the administrative burdens.		
(6) The strategy on agricultural statistics for 2020 and beyond ⁽³⁾ , endorsed by the European Statistical System Committee ('ESSC') in November 2015, envisages the adoption of two framework regulations covering all aspects of EU legislation on agricultural statistics, with the exception of the economic accounts for agriculture. This Regulation is one of those two framework regulations and should		

the European Communities, Council Regulation (EC) No 322/97 on Community Statistics, and Council Decision 89/382/EEC, Euratom establishing a Committee on the Statistical Programmes of the European Communities (OJ L 87, 31.3.2009, p. 164).

³ <https://ec.europa.eu/eurostat/web/agriculture/methodology/strategy-beyond-2020>

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complement the already adopted framework Regulation (EU) 2018/1091 ⁽⁴⁾ .		
<p>(7) European statistics on agricultural inputs and outputs are currently collected, produced and disseminated on the basis of a number of legal acts. This structure does not provide proper consistency across the individual statistical domains, nor does it promote an integrated approach towards the development, production and dissemination of agricultural statistics. This Regulation should replace those legal acts for the purposes of harmonisation and comparability of information, and to ensure consistency and coordination across European agricultural statistics, facilitate the integration and streamlining of the corresponding statistical processes, and enable a more holistic approach. It is therefore necessary to repeal Regulations</p>		

⁴ Regulation (EU) 2018/1091 of the European Parliament and of the Council of 18 July 2018 on integrated farm statistics and repealing Regulations (EC) No 1166/2008 and (EU) No 1337/2011 (OJ L 200, 7.8.2018, p. 1).

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<p>(EC) No 1165/2008 ⁽⁵⁾, (EC) No 543/2009⁽⁶⁾ and (EC) No 1185/2009 of the European Parliament and of the Council ⁽⁷⁾, and Council Directive 96/16/EC ⁽⁸⁾. The numerous related European Statistical System (ESS) agreements and gentlemen's agreements on data transmission should be integrated into this Regulation where there has been evidence that the data fulfil user needs, that the agreed methodology works and that the data are of appropriate quality.</p>		
<p>(8) The statistics required in accordance with Commission Regulation (EC) No 617/2008 ⁽⁹⁾ have been collected by the ESS, meeting some, but not all of its quality standards. Those statistics</p>		

⁵ Regulation (EC) No 1165/2008 of the European Parliament and of the Council of 19 November 2008 concerning livestock and meat statistics and repealing Council Directives 93/23/EEC, 93/24/EEC and 93/25/EEC (OJ L 321, 1.12.2008, p. 1).

⁶ Regulation (EC) No 543/2009 of the European Parliament and of the Council of 18 June 2009 concerning crop statistics and repealing Council Regulations (EEC) No 837/90 and (EEC) No 959/93 (OJ L 167, 29.6.2009, p. 1).

⁷ Regulation (EC) No 1185/2009 of the European Parliament and of the Council of 25 November 2009 concerning statistics on pesticides (OJ L 324, 10.12.2009, p. 1).

⁸ Council Directive 96/16/EC of 19 March 1996 on statistical surveys of milk and milk products (OJ L 78, 28.3.1996, p. 27).

⁹ Commission Regulation (EC) No 617/2008 of 27 June 2008 laying down detailed rules for implementing Regulation (EC) No 1234/2007 as regards marketing standards for eggs for hatching and farmyard poultry chicks (OJ L 168, 28.6.2008, p. 5).

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<p>support European and national policies in the longer term and should be integrated as European statistics to guarantee the availability and quality of the data. In order to avoid double reporting from the Member States, the statistical requirements under Regulation (EC) No 617/2008 should be removed.</p>		
<p>(9) A large part of the European agricultural area consists of grasslands. The production of those areas was not considered to be important in the past, so no production data have been included in crop statistics. As the impact of grasslands and ruminants on the environment has become more important due to climate change, statistics on grassland production and animal grazing are needed.</p>		
<p>(10) For the purposes of harmonisation and comparability of information on agricultural input and output with information on the structure of agricultural holdings and to further implement the strategy on agricultural statistics for 2020</p>		

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and beyond, this Regulation should complement Regulation (EU) 2018/1091.		
(11) Regulation (EC) No 138/2004 of the European Parliament and of the Council ⁽¹⁰⁾ does not cover agricultural price statistics, but their availability and coherence with the economic accounts for agriculture ('EAA') should be ensured. As the EAA are a satellite account of national accounts, it is not appropriate to include agricultural price statistics in Regulation (EC) No 138/2004. Statistics on agricultural input and output should therefore cover statistics on agricultural input prices that are coherent with the EAA. Absolute agricultural output price data should be available in Member States to allow EAA calculations and comparable price indices.		
(12) Data regarding the placing on the market and use of pesticides to be		General reservation

¹⁰ Regulation (EC) No 138/2004 of the European Parliament and of the Council of 5 December 2003 on the economic accounts for agriculture in the Community (OJ L 33, 5.2.2004, p. 1).

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submitted pursuant to Directive 2009/128/EC of the European Parliament and of the Council ⁽¹¹⁾ and Regulation (EC) No 1107/2009 of the European Parliament and of the Council ⁽¹²⁾ should be used in accordance with the relevant provisions of that Directive and of that Regulation for the purposes of the requirements of this Regulation.		
(13) Comparable statistics from all Member States on agricultural input and output are important to determine the development of the CAP. Standard classifications and common definitions should therefore be used insofar as possible for variables.		
(14) The data needed to compile statistics should, where possible, be collected in a manner with the least costs and administrative burden. It is therefore		

¹¹ Directive 2009/128/EC of the European Parliament and of the Council of 21 October 2009 establishing a framework for Community action to achieve the sustainable use of pesticides (OJ L 309, 24.11.2009, p. 71).

¹² Regulation (EC) No 1107/2009 of the European Parliament and of the Council of 21 October 2009 concerning the placing of plant protection products on the market and repealing Council Directives 79/117/EEC and 91/414/EEC (OJ L 309, 24.11.2009, p. 1).

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<p>necessary to identify possible owners of sources of the required data and ensure that these can be used for statistics.</p>		
<p>(15) The datasets to be transmitted cover several statistical domains. In order to maintain a flexible approach that allows the statistics to be adapted when data requirements change, only the domains, topics and detailed topics should be specified in the basic regulation, with the detailed data sets specified in implementing acts.</p>		
<p>(16) Organic production is becoming increasingly important as an indicator of sustainable agricultural production systems. It is therefore necessary to ensure that available statistics on organic farming are consistent with other agricultural production statistics by integrating those in the datasets. Those organic production statistics should also be coherent with and use the administrative information produced under Regulation (EU)</p>		

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2018/848 of the European Parliament and of the Council ⁽¹³⁾ .		
(17) In accordance with Regulation (EC) No 1059/2003 of the European Parliament and of the Council ⁽¹⁴⁾ , territorial units should be defined in accordance with the Nomenclature of Territorial Units for Statistics ('NUTS') classification.		
(18) It should be possible to collect data on ad- hoc subjects related to agricultural input and output at a specific time in order to supplement the data collected on a regular basis with complementary data on subjects that require more information, emerging phenomena or innovations	(18) It should be possible to collect data on ad-hoc subjects related to agricultural input and output at a specific time in order to supplement the data collected on a regular basis with complementary data on subjects that require more information, emerging phenomena or innovations. <u>The need for such data must be duly justified</u>	
(19) In order to decrease the administrative burden on Member States, exemptions from certain regular		

¹³ Regulation (EU) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation (EC) No 834/2007 (OJ L 150, 14.6.2018, p. 1).

¹⁴ Regulation (EC) No 1059/2003 of the European Parliament and of the Council of 26 May 2003 on the establishment of a common classification of territorial units for statistics (NUTS) (OJ L 154, 21.6.2003, p. 1).

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transmissions of data should be allowed if Member States' contributions to the EU total for these data are low.		
(20) In order to improve the efficiency of the statistical production processes of the ESS and to reduce the administrative burden on respondents, national statistical institutes ('NSIs') and other national authorities should have the right to access and use, promptly and free of charge, any administrative data that are gathered for public purposes, irrespective of whether they are held by public or private bodies. NSIs and other national authorities should also be able to integrate those administrative data with statistics, to the extent that such data are necessary for developing, producing and disseminating European agricultural statistics, in accordance with Article 17a of Regulation (EC) No 223/2009.	(20) In order to improve the efficiency of the statistical production processes of the ESS and to reduce the administrative burden on respondents, national statistical institutes ('NSIs') and other national authorities should have the right to access and use, promptly and free of charge, any administrative data that are <u>gathered</u> needed for public purposes, irrespective of whether they are held by public, <u>semi-public</u> or private bodies. NSIs and other national authorities should also be able to integrate those administrative data with statistics, to the extent that such data are necessary for developing, producing and disseminating European agricultural statistics, in accordance with Article 17a of Regulation (EC) No 223/2009.	
(21) Member States or responsible national authorities should endeavour to		

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modernise data collection modes insofar as possible. The use of digital solutions should be promoted.		
(22) In order to ensure flexibility and to reduce the administrative burden on respondents, NSIs and other national authorities, Member States should be allowed to use statistical surveys, administrative records and any other sources, methods or innovative approaches, including scientifically based and well documented methods such as imputation, estimation and modelling. The quality, and in particular the accuracy, timeliness and comparability of statistics based on these sources, should always be ensured.		
(23) Regulation (EC) No 223/2009 includes provisions on the transmission of data from Member States to the Commission (Eurostat) and on the use of such data, including on the transmission and protection of confidential data. Measures taken in accordance with this		

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<p>Regulation are to ensure that confidential data are transmitted and used exclusively for statistical purposes in accordance with Articles 21 and 22 of Regulation (EC) No 223/2009.</p>		
<p>(24) Regulation (EC) No 223/2009 provides for a reference framework for European statistics and requires Member States to comply with the statistical principles and quality criteria specified in that Regulation. Quality reports are essential for assessing, improving and communicating the quality of European statistics. The ESSC has endorsed the single integrated metadata structure as the ESS standard for quality reporting, thereby helping to satisfy, through uniform standards and harmonised methods, the statistical quality requirements laid down in Article 12 (3) of Regulation (EC) No 223/2009. That ESS standard is to contribute to the harmonisation of quality reporting under this Regulation</p>		

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<p>(25) An impact assessment has been carried out in accordance with the principle of sound financial management, in order to focus the statistical programme established by this Regulation on the need for effectiveness in achieving the objectives and in order to incorporate budgetary constraints.</p>		
<p>(26) Since the objective of this Regulation, namely the systematic production of European statistics on agricultural input and output in the Union, cannot be sufficiently achieved by the Member States because a coordinated approach is required, but can rather, by reasons of consistency and comparability, be better achieved at Union level, the Union may adopt measures in accordance with the principle of subsidiarity as set out in Article 5 of the Treaty on European Union. In accordance with the principle of proportionality as set out in that article, this Regulation does not go beyond what</p>		

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is necessary in order to achieve that objective.		
<p>(27) In order to take into account emerging data needs mainly stemming from new developments in agriculture, from revised legislation and from changing policy priorities, the power to adopt acts in accordance with Article 290 of the Treaty on the Functioning of the European Union should be delegated to the Commission in order to amend the detailed topics listed in this Regulation and to establish the topics and detailed topics to be provided and other practical arrangements for the collection of ad hoc data as laid down in this Regulation. It is of particular importance that the Commission carry out appropriate consultations during the preparatory work, including at expert level, and that those consultations are conducted in accordance with the principles laid down in the Inter-institutional Agreement of 13 April 2016</p>		

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<p>on Better Law-Making ⁽¹⁵⁾. In particular, to ensure equal participation in the preparation of delegated acts, the European Parliament and the Council receive all documents at the same time as Member State experts, and their experts systematically have access to meetings of Commission expert groups dealing with the preparation of delegated acts.</p>		
<p>(28) In order to ensure uniform conditions for this Regulation's implementation, the Commission should be given implementing powers to specify the datasets linked to the topics and detailed topics listed in the Annex and the technical elements of the data to be provided, to establish the lists and descriptions of the variables and other practical arrangements for the collection of ad hoc data, and to set out the practical arrangements for and contents of the quality reports. Those powers should be exercised in accordance with Regulation</p>		

¹⁵ OJ L 123, 12.5.2016, p. 1.

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(EU) No 182/2011 of the European Parliament and of the Council ⁽¹⁶⁾ .		
(29) Where this Regulation's implementation would require major adaptations to the national statistical system of a Member State, the Commission should, in duly justified cases and for a limited period of time, be able to grant derogations to the Member States concerned. Such major adaptations may arise in particular from the need to adapt the data collection systems to include the new data requirements, including the access to administrative sources.	(29) Where this Regulation's implementation would require major adaptations to the national statistical system of a Member State, the Commission should, in duly justified cases and for a limited period of time, be able to grant derogations to the Member States concerned. Such major adaptations may arise in particular from the need to adapt the data collection systems to include the new data requirements, including the access to administrative sources <u>and other relevant sources</u> .	We propose changes to the text in line with proposal in article 8 par. 1.

¹⁶ Regulation (EU) No 182/2011 of the European Parliament and of the Council of 16 February 2011 laying down the rules and general principles concerning mechanisms for control by Member States of the Commission's exercise of implementing powers (OJ L 55, 28.2.2011, p. 13.).

<p>(30) The financial interests of the Union should be protected through proportionate measures throughout the expenditure cycle, including the prevention, detection and investigation of irregularities, the recovery of funds lost, wrongly paid or incorrectly used and, where appropriate, administrative and financial penalties.</p>		
<p>(31) This Regulation should apply without prejudice to both Directive 2003/4/EC⁽¹⁷⁾ and Regulation (EC) No 1367/2006⁽¹⁸⁾.</p>		
<p>(32) Collaboration and coordination between the authorities within the framework of the ESS should be strengthened to ensure coherence and comparability of European agricultural statistics produced in accordance with the principles laid down in Article 338(2) of the Treaty on the Functioning of the European Union. Data is also collected by other Union bodies beyond those referred</p>		

¹⁷ Directive 2003/4/EC of the European Parliament and of the Council of 28 January 2003 on public access to environmental information and repealing Council Directive 90/313/EEC (OJ L 41, 14.2.2003, p. 26).

¹⁸ Regulation (EC) No 1367/2006 of the European Parliament and of the Council of 6 September 2006 on the application of the provisions of the Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters to Community institutions and bodies (OJ L 264, 25.9.2006, p. 13).

to in this Regulation and by other organisations. Cooperation between such organisations and those involved in the ESS should therefore be reinforced in order to take advantage of synergies.		
(33) The ESSC has been consulted,		
HAVE ADOPTED THIS REGULATION:		
<i>Article 1</i>		
Subject matter		
This Regulation establishes a framework for aggregated European statistics related to the inputs and outputs of agricultural activities, as well as the intermediate use of such output within agriculture and its collection and industrial processing.		

<i>Article 2</i>		
Definitions		
For the purposes of this Regulation, the definitions of ‘agricultural activity’, ‘utilised agricultural area’, ‘livestock unit’, ‘agricultural holding’ and ‘common land agricultural unit’, as laid down in Article 2, points (a), (b), (d), and (e) of Regulation (EU) 2018/1091 shall apply.		
In addition, the following definitions shall apply:		
(1) ‘dairy enterprise’ means an enterprise or agricultural holding that purchases whole milk or, in certain cases, milk products, in order to transform them into milk products; and enterprises that collect milk or cream in order to transfer it in whole or in part, without any processing, to other dairy enterprises ;		
(2) ‘slaughterhouse’ means an officially registered and approved enterprise with permission to slaughter and dress animals, the meat of which is intended for human consumption;		

<p>(3) 'hatchery' means an enterprise for incubating eggs, hatching and supplying chicks;</p>		
<p>(4) 'reporting unit' means the unit that supplies the statistical data;</p>	<p>(4) 'reporting unit' means the unit that supplies the statistical data;</p>	<p>We suggest that "reporting unit" is deleted. The reporting unit varies from country to country and establishing harmonized rules seems not relevant. Instead reporting units may be used as examples of data providers / administrative data registers in handbooks. The definition of the reporting units is included in Art.3 par. 3 and Art 5 par. 9. Keeping "reporting unit" in these paragraphs seems inappropriate and as a result "reporting unit" is suggested to be deleted in these articles.</p>
<p>(5) 'observation unit' means an identifiable entity about which data can be obtained;</p>	<p>(5) (4) 'observation unit' means an identifiable entity about which data can be obtained;</p>	
<p>(6) 'domain' means one or several data sets that cover particular topics;</p>	<p>(6) (5) 'domain' means one or several data sets that cover particular topics;</p>	
<p>(7) 'topic' means the content of the information to be compiled about the observation units, each topic covering one or more detailed topics;</p>	<p>(7)(6) 'topic' means the content of the information to be compiled about the observation units, each topic covering one or more detailed topics;</p>	

<p>(8) ‘detailed topic‘ means the detailed content of the information to be compiled about the observation units related to a topic, each detailed topic covering one or more variables;</p>	<p>(8) <u>(7)</u> ‘detailed topic‘ means the detailed content of the information to be compiled about the observation units related to a topic, each detailed topic covering one or more variables;</p>	
<p>(9) ‘data set‘ means one or several aggregated variables organised as a table;</p>	<p>(9) <u>(8)</u> ‘data set‘ means one or several aggregated variables organised as a table</p>	
<p>(10) ‘variable‘ means a characteristic of a unit being observed that may assume more than one of a set of values;</p>	<p>(10) <u>(9)</u> ‘variable‘ means a characteristic of a unit being observed that may assume more than one of a set of values;</p>	
	<p><u>(10) ‘Value’ means the smallest unit of aggregated data within a data set to be transmitted to the Commission;</u></p>	<p>We propose a new definition which is necessary when we propose to introduce a limitation on number of values in article 5. Par. 11.</p>
<p>(11) ‘pre-checked data‘ means data verified by the Member States, based on agreed common validation rules, wherever available;</p>		
<p>(12) ‘ad hoc data‘ means data that are of a particular interest for users at a specific point in time but that are not included in the regular data sets;</p>		

<p>(13) ‘administrative data‘ means data generated by a non-statistical source, usually held by a public or private body, the main aim of which is not to provide statistics;</p>		
<p>(14) ‘metadata‘ means information that is needed to be able to use and interpret statistics and which describes data in a structured way;</p>		
<p>(15) ‘professional user‘ means any person who uses plant protection products in the course of their professional activities, including operators, technicians, employers and self-employed people, in the farming sector.</p>	<p>(15) ‘professional user‘ means any (<u>natural or legal</u>) person who uses plant protection products in the course of their professional activities <u>in the agricultural sector. It includes</u> including operators, technicians, employers and self-employed people., in the farming sector.</p>	<p>We do not think “The farming sector” is a proper term. We suggest to use the term „agriculture” instead.</p>

<i>Article 3</i>		
Statistical population and observation units		
<p>1. The statistical population to be described shall consist of statistical units such as agricultural holdings, common land agricultural units, enterprises providing goods and services to agriculture or buying or collecting products from agricultural activities, and enterprises processing these agricultural products, especially hatcheries, dairy enterprises and slaughterhouses.</p>	<p>1. The statistical population to be described shall consist of statistical units such as agricultural holdings, common land agricultural units, enterprises providing goods and services <u>related</u> to agriculture <u>activities</u> or buying or collecting products from agricultural activities, and enterprises processing these agricultural products, especially hatcheries, dairy enterprises and slaughterhouses.</p>	<p>The term “Enterprises providing goods and services” is very broad in scope and covers for example financial institutions. In order to narrow down the scope for goods and services it is suggested to add the text “related directly to agricultural activities”. This ensures that the scope is only goods and services related directly to the production of agricultural products.</p> <p>Can the Commission please clarify if the current formulation of this paragraph also includes the statistical population for the survey of purchasing values of agricultural land (land price statistics)?</p>
<p>2. The observation units to be represented in the statistical frame shall be the statistical units referred to in paragraph 1 and, depending on the statistics to be reported, the following:</p>		
<p>(a) land used for agricultural activity;</p>		
<p>(b) animals used for agricultural activity;</p>		

(c) imports and exports of products from agricultural activities by non-agricultural enterprises;		We would like to receive a clarification from the Commission clarify what is meant by non-agricultural enterprises? Why not agricultural enterprises ?
(d) transactions and flows of production factors, of goods and services to and from agricultural activities.		
3. The reporting units shall be the statistical units referred to in paragraph 1 and other enterprises and institutions handling information about the data requirements referred to in Articles 5 and 6.	3. The reporting units shall be the statistical units referred to in paragraph 1 and other enterprises and institutions handling information about the data requirements referred to in Articles 5 and 6.	See comment on Article 2 par. 9.
<i>Article 4</i>		
Coverage requirements		
1. The statistics shall be representative of the statistical population that they describe.		
2. For the domain of animal production statistics as referred to in Article 5(1), point (a), the data shall cover 95 % of the livestock units of each Member State and the related activities or outputs.		

<p>3. For the domain of crop production statistics as referred to in Article 5(1), point (b), and the topic of nutrients as referred to in Article 5(1), point (d)(i), the data shall cover 95% of the total utilised agricultural area (excluding kitchen gardens) of each Member State and the related production volumes.</p>		
<p>4. For the topic of plant protection products as referred to in Article 5(1), point (d)(iii), the data shall cover the plant protection products placed on the market as defined in Article 3, point 9 of Regulation (EC) No 1107/2009 .</p>		<p>Scrutiny reservation cf. art. 8</p>
<p>5. The Commission may adopt implementing acts further specifying the coverage requirements referred to in paragraphs 2, 3 and 4. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 15(2).</p>	<p>5. The Commission may adopt implementing acts further specifying the coverage requirements referred to in paragraphs 2, 3 and 4. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 15(2).</p> <p><u>5. The Commission may adopt implementing acts, taking into account of economic and technical trends, to lower the coverage requirements referred to in paragraph 2 and 3. Those implementing acts shall be adopted in accordance with</u></p>	<p>We acknowledge that the Commission wants to introduce implementing act when not all domains and topics are covered in article 4.</p> <p>However, this paragraph is drafted in very broad terms, without providing for any specific condition or criteria, and even without a reference to basic conditions such as “necessity” or “adaptation to technical progress”.</p> <p>In addition, it gives a very wide margin of appreciation to the Commission and contains general open-ended provisions,</p>

	<p><u>the examination procedure referred to in Article 16 not later than 18 months before the beginning of the reference period.</u></p>	<p>without limitations and safeguards for Member States.</p> <p>In our view, the empowerment conferred to the Commission should be strictly circumscribed and safeguards should be included in order to avoid an increase in administrative burdens for businesses and production costs for Member States.</p> <p>Therefore, we introduced that the Commission is only empowered to lower the coverage requirements (95 % threshold in paragraph 2 and 3) and not to raise it above 95 %.</p> <p>Moreover, on the basis of the current Commission proposal it is not explicitly clear what is meant by “further specifying these coverage requirements.” What should be further specified and how can you further specify the coverage rate of 95%? We would like to receive clarification of this from the Commission.</p> <p>Finally, without prejudice to the above comments, if it is the Commission's intention to “further specifying these coverage requirements” of the domains and topics not covered by Paragraph 2-4, i.e. domain ‘Agriculture price statistics’ (Article 5(1)(c)) and topic ‘Nutrient balances’ (Article 5(1)(d)(ii)), the</p>
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		delegation of power must at least be restricted to these subject areas.
<i>Article 5</i>		
Regular data requirements		
1. The statistics referred related to the inputs and outputs of agricultural activities shall cover the following domains and topics:		
(a) animal production statistics		
(i) livestock and meat		
(ii) eggs and chicks		
(iii) milk and milk products		
(b) crop production statistics		
(i) crop production	(i) crop production	We propose a new categorisation of topics, resulting from our proposal to introduce minimum deadlines in a new Annex II. This concept is introduced in Article 5 paragraph 8.
	(i) <u>Crops - main area</u>	
	(ii) <u>Crop production on arable land and permanent grassland not specifying regional and organic production</u>	
	(iii) <u>Crop production on arable land and permanent grassland specifying regional and organic production</u>	

	(iv) <u>Horticulture production only vegetables, fruits, berries and nuts not specifying regional and organic production</u>	
	(v) <u>Horticulture production only vegetables, fruits, berries and nuts specifying regional and organic production</u>	
	(vi) <u>Horticulture production of citrus fruits, grapes and olives</u>	
(ii) crop balances		
(iii) grasslands and grazing		
(c) agricultural price statistics		
(i) agricultural price indices		
	<u>(ii) price weights and re-basing</u>	
(ii) absolute input prices	(ii) <u>(iii)</u> absolute input prices	
(iii) agricultural land prices and rents	(iii) <u>(iv)</u> agricultural land prices and rents	
(d) statistics on nutrients and plant protection products		
(i) nutrients in agricultural fertilisers	(i) — nutrients in agricultural fertilisers <u>(i) nutrients in fertilisers for agriculture</u>	We suggest a change in wording. There are no agricultural fertilisers, only fertilisers to be used in agriculture.
(ii) nutrient balances		
(iii) plant protection products		
2. The detailed topics shall be as set out in the Annex.	2. The detailed topics shall be as set out in the Annex <u>I</u> .	

<p>3. The data shall be transmitted to the Commission in the form of aggregated data sets.</p>		
<p>4. The data on organic production and products that comply with Regulation (EU) 2018/848 shall be integrated into the data sets.</p>	<p>4. The data on organic production and products that comply with Regulation (EU) 2018/848 shall be <u>limited to:</u> integrated into the data sets. <u>a) Animal Production Statistics (art. 5.1(a))</u> <u>b) Crop Production Statistics (art. 5.1(b))</u></p>	<p>The text is very broad in scope since Regulation (EU) 2018/848 covers all activities, not only agricultural activities but also aquaculture and pharma industries. In order to narrow down the scope for organic production and products it is suggested to be explicit on the limitations.</p>
<p>5. Regional data shall be provided at NUTS2 level as defined in Regulation (EC) No 1059/2003.</p>	<p>5. Regional data shall be provided at NUTS2 level as defined in Regulation (EC) No 1059/2003.</p> <p><u>In duly justified cases Member States may be exempted from the requirement to transmit data at NUTS 2 level. The Members States concerned shall submit a request by [insert a deadline] at the latest to the Commission, justifying the need for granting exemptions for the data transmissions at NUTS 2 level. The Commission shall examine the requests for exemptions and, shall adopt implementing acts in accordance with the examination procedure referred to in Article 16</u></p>	<p>In general, data delivery at NUTS II - level means higher burden for MS than data delivery at NUTS I-level. The size of NUTS-regions varies greatly between the MS and is not an optimal spatial reference for agricultural issues, as the NUTS-regions are determined on the basis of population figures. In particular in densely populated MS there are comparatively small NUTS regions. For example in the case of DE, the NUTS I-level was therefore the delivery level for regional data on crops and animals in the past. Switching to the NUTS II-level would significantly increase burden.</p>

<p>6. Where a variable has low or zero prevalence in a Member States, the values of that variable may be excluded from the transmitted data sets, if the Member State concerned has duly justified its exclusion to the Commission (Eurostat).</p>		
<p>7. Relevant price information on agricultural input and output, including the characteristics and weights of the goods and services, shall be collected by Member States for compiling comparable price indices and for the variables necessary for the economic accounts for agriculture covered by Regulation (EC) No 138/2004.</p>		
	<p><u>8. The minimum deadline for transmitting data sets to the Commission are set out in Annex II.</u></p> <p><u>The deadlines in Annex II are the minimum periods of time between the end of the reference period or the reference day (depending on the topic) and the date for transmitting data, which the Member States need for the preparation of data sets, which the Commission must respect when applying the procedure under Art.5(9).</u></p>	<p>In article 5, par. 9h) the Commission is empowered to adopt implementing acts defining the deadlines for transmitting the data. We acknowledge the need for flexibility but we do also need to have predictability for Member States. Member States need to know the deadlines at least for transmitting final data in order to establish a cost effective statistical system. Deadlines should not be part of an implementing regulation which will result in the opportunity to change deadlines more frequently. We suggest to establish a generic model for deadlines of final data that is related to the reference</p>

		<p>periods. The suggestion is to implement an annex II where deadlines for transmission of final data per topic are defined. We suggest that deadlines in annex II are minimum deadlines which means that the Commission may extend the deadlines in implementing acts but cannot decide deadlines earlier those mentioned in Annex II. Deadlines for transmission of estimates and provisional data will be set out in implementing acts.</p>
<p>8. The Commission is empowered to adopt delegated acts in accordance with Article 14 amending the detailed topics set out in the Annex.</p>	<p>8<u>9</u>. The Commission is empowered to adopt delegated acts in accordance with Article 14<u>15</u> amending the detailed topics <u>and the corresponding frequencies and reference periods</u> set out in the Annex I. <u>When exercising its power to adopt such delegated acts, the Commission shall ensure that the following conditions are fulfilled:</u></p>	<p>General comments: This paragraph causes us great concern. We are of the opinion that the empowerment for the Commission to adopt delegated acts is too broad for us to accept and consider that the measures pursuant to the entire article would have a significant effect on the very scope of the Regulation.</p> <p>In addition, those delegated acts potentially have far-reaching consequences in terms of development and production costs for Member States, as well as the response burden on businesses.</p> <p>Furthermore, we consider it an important precondition to limit the exercise of the delegated powers thus conferred: the empowerment should be strictly circumscribed and safeguards should be</p>

		<p>included in order to avoid an increase in response burden and production costs.</p> <p>Specific comments: A slight modification is proposed to eliminate the legal loophole concerning frequency and reference periods corresponding to the detailed topics amended by delegated acts. See also comments to Article 7 paragraph 1.</p>
	<p>a) <u>the delegated acts aim to achieve cost and burden neutrality or reduction and do not, in any case, impose a significant additional cost or burden on the Member States or on the respondents;</u></p>	<p>The (legal) structure proposed is identical to that of Regulation (EU) 2019/2152 on European Business statistics (FRIBS). See Article 6 of the FRIBS regulation, art. 6(5) point a. of that Regulation.</p>
	<p>b) <u>a maximum of [1] detailed topic for the domain animal production statistics, [1] detailed topics for the domain crop production statistics, [1] detailed topics for the domain agricultural price statistics and [1] detailed topics for the domain statistics on nutrients and plant production products listed in Annex I are replaced by another detailed topic and a maximum of [2] detailed topic in total for all domains is replaced over a period of five consecutive years;</u></p>	

	c) <u>the delegated acts are adopted at least 18 months before the start of the reference period of the data.</u>	
	d) <u>any new detailed topic is assessed in respect of its feasibility by means of pilot studies carried out by the Member States in accordance with Article 11.</u>	As a rule of principle, any new detailed topic should involve a feasibility study.
9. The Commission may adopt implementing acts to define the data sets to be transmitted to the Commission (Eurostat). Those implementing acts shall specify the following technical elements of the data to be provided, where appropriate:	9 10. <u>For the detailed topics listed in Annex I, Member States shall compile data relevant to each detailed topic.</u> The Commission may adopt implementing acts to define the data sets to be transmitted to the Commission (Eurostat). Those implementing acts shall specify the following technical elements of the data to be provided, where appropriate:	<p>This paragraph causes us great concern. We are of the opinion that the empowerment for the Commission to adopt implementing acts is too broad for us to accept, and consider that the measures pursuant to the entire article would have a significant effect on the very scope of the Regulation.</p> <p>In addition, those implementing acts potentially have far-reaching consequences in terms of development and production costs for Member States, as well as for the response burden on businesses.</p> <p>Furthermore, we consider it an important precondition to limit the exercise of the implementing powers thus conferred: the empowerment should be strictly circumscribed and safeguards should be included in order to avoid an increase in response burden and production costs.</p>

		<p>We suggest retaining point a) only as ‘variables’ and delete points b), c) and d) as they also describe characteristics of variables.</p> <p>We suggest reporting units be deleted in point e), see Art. 2 par.9.</p> <p>In our opinion, precision requirements cannot be set for the domains Agricultural Price Statistics and Statistics on Nutrients and Plant Protection Products, Nutrient Balances as situations may differ strongly between Member States and it is therefore not possible to establish realistic precision requirements. Instead, we suggest that the issue of precision should be part of the quality report.</p> <p>Finally, we propose modifying point h) ‘deadline for transmitting the data’. We acknowledge the need for flexibility but Member States also need to have predictability; they need to know the deadlines at least for transmitting final data in order to establish a cost-effective statistical system. The deadlines should not be part of an implementing regulation which will result in the risk of more frequent deadline changes.</p>
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		We suggest establishing a generic model for deadlines for final data that is related to the reference periods: implement an Annex II where deadlines for transmission of final data per topic are defined. We suggest that the deadlines in annex II be earliest deadlines, i.e. that the Commission may extend the deadlines in implementing acts but cannot move deadlines to an earlier date than those mentioned in Annex II. The deadlines for transmission of estimates and provisional data will be set out in implementing acts.
(a) the list of variables;	(a) the list of variables;	
(b) the descriptions of the variables;	(b) — the descriptions of the variables;	
(c) the variables on organic production and products;	(c) — the variables on organic production and products;	
(d) the variables at regional level;	(d) — the variables at regional level;	
(e) the observation and reporting units;	(b) the observation and reporting units;	
(f) the precision requirements;	(f c) the precision requirements <u>precision requirements are not relevant for “Crop balances” (art. 5(1)(b)(ii)), ‘Agriculture Price Statistics’ (art. 5(1)(c)) and ‘Nutrient Balances’ (art. 5(1)(d)(ii));</u>	

(g) the methodological rules;	(g) — the methodological rules;	
(h) the deadlines for transmitting the data.		
Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 15(2) not later than 9 months before the beginning of the reference year.	Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 15 16(2) not later than 9 18 months before the beginning of the reference year.	
	<p><u>11. When adopting implementing acts in accordance with point (a), (c) and (d) of paragraph 9, the Commission shall ensure that the number of values to be transmitted at country level in the transmission of final data and in each domain listed in paragraph 1 does not exceed:</u></p> <p><u>(a) [740] values for the domain ‘Animal production statistics’; (b) [450] values for the domain ‘Crop production statistics’; (c) [100] values for the domain ‘Agricultural price statistics’; and (d) [20 values for the domain ‘Statistics on nutrients and plant protection products’, not including topic “Plant protection products”], every year.</u></p> <p><u>For the purpose of transparency and of avoiding additional burden a common counting method for values in the data</u></p>	<p>There is a need for introducing safeguards that ensure the level of burden for Member States and on the respondents.</p> <p>In the draft proposals for implementing acts for each domain we have counted how many values Member States are expected to transmit at country level.</p> <p>We only suggest limiting the number of values at Member State level and not at regional level as there is great variation in the number of regions between the Member States and therefore in the number of values to be transmitted. The starting point for introducing a safeguard is the number of values to be transmitted under existing regulations and as such legally binding. We have counted 737 values in the domain Animal Production</p>

	<p><u>sets for the data transmission to Eurostat is agreed. Prior to the adjustment/specifying number of values, the Commission shall submit a comparison of the current and the planned values to the Member States to set out the counting results according to the described counting method.</u></p> <p><u>For the detailed topic „Plant protection products placed on the market“, values comprise the list of substances to be covered and their classification in categories of products and chemical classes. This list shall be updated every 5 years if necessary to take into account technical and economic developments.</u></p>	<p>under legislation currently in force, and 757 values in the draft implementing act; 422 values in Crop Production under legislation currently in force, and 768 values in the draft implementing act; 88 values in Price statistics under legislation today and 239 values in the draft implementing act; 0 values in Nutrients and Plant Protection Products under legislation today and 390 values in the draft implementing act.</p> <p>We have not included values from the topic “plant protection products”.</p> <p>Many of the values are new or new in terms of legally binding obligations, since they have previously only been included in ESS agreements or gentlemen’s agreements.</p> <p>In order to avoid an increase in the burden for the Member States and the respondents, it is suggested to reduce the number of values and still keep the flexibility for the Commission to obtain sufficient information. That is the reason why we suggest a higher number of values, compared to the current situation.</p> <p>(a) In Animal production we suggest a minor reduction in number of values which should be within the topic of milk</p>
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		<p>and milk products where the level of detail is very large.</p> <p>(b) In Crop Statistics the number of variables has been almost doubled. Thus, we suggest a reduction which should be within topics crop production, crop balances and grasslands and grazing.</p> <p>(c) In the domain of Prices there are too many variables on nutrients and feeding stuff and price indices.</p> <p>(d) In the domain of Nutrients and PPP, there are many complex new variables which will cause a significant burden for the Member States. Several of the variables will be complex to establish, therefore there is a need to reduce the number of variables.</p> <p>We have concerns about the new data the Commission (Eurostat) wants to introduce (now voluntary) in Annex III of the existing pesticide regulation 1185/2009, namely a differentiation of the amount of a PPP placed on the market according to user groups. Therefore, we suggest adding a new text in Article 5. Also, in general we have reservations about the number of values for this topic and for nutrients in fertilisers for agriculture.</p>
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	<p><u>12. Where new data are required in order to respond to user needs and to provide for a certain degree of flexibility, the Commission may change at country level not more than [10 % of the values in the domain animal production statistics; 10 % of the values in the domain crop production statistics; 10 % of the values in the domain agricultural price statistics; 10 % of the values in the domain nutrients and plant production products and a maximum of 5 % in total of all domains in any period of five consecutive calendar years], in accordance with paragraph 10.</u></p>	
	<p><u>13. When preparing the implementing acts referred to in paragraph 10, any potential additional cost or administrative burden on Member States or on the respondents shall be taken into account together with an assessment of the envisaged improvement of the quality of the statistics and any other direct or indirect benefit resulting from the additional proposed action.</u></p>	
<p>10. Member States shall transmit pre-checked data and related metadata using a technical format specified by the Commission (Eurostat) for each data set. The single entry point services shall be used to transmit the data to the Commission (Eurostat).</p>	<p>10 14. Member States shall transmit pre-checked data and related metadata using a technical format specified by the Commission (Eurostat) for each data set. The single entry point services shall be used to transmit the data to the Commission (Eurostat).</p>	

<i>Article 6</i>		
Ad hoc data requirements		
1. The Commission is empowered to adopt delegated acts supplementing this Regulation in accordance with Article 14 concerning specifying the information to be provided on an ad hoc basis, where collection of additional information is deemed necessary. Those delegated acts shall specify:		
(a) the topics and detailed topics to be provided in the ad hoc data collection and the reasons for such additional statistical needs;		
(b) the reference periods.		
	<p><u>2. When the Commission is exercising its power to adopt delegated acts in accordance with paragraph 1, the following conditions shall be ensured:</u></p> <p><u>a. the delegated shall not impose significant additional costs which result in a disproportionate and unjustified burden on agricultural holdings and on Member States</u></p>	<p>There are no safeguard clauses which take into account the burden for respondents and Member States. In order to ensure transparency and legal certainty safeguards needs to be introduced. Therefore we suggest using similar safeguard provisions as those in Regulation (EU) 2019/2152 . The maximum of one new topic and three new detailed topics and a maximum of 40 values in total.</p>

	<u>b. a maximum of one new topic and three detailed topics for all domains in total and a maximum of 40 values in total to be transmitted to the Commission (Eurostat).</u>	The wording is adjusted to the text of article 9 (ad-hoc data) paragraph 4 the Regulation (EU) 2018/1091
2. The Commission is empowered to adopt delegated acts referred to in paragraph 1 starting with the reference year <i>[insert 2 years after entering into force of the regulation]</i> and with a minimum of 2 years between each ad hoc data collection.	23 . The Commission is empowered to adopt delegated acts referred to in paragraph 1 starting with the reference year <i>[insert 2 years after entering into force of the regulation]</i> and with a minimum of 2 years between each ad hoc data collection, <u>starting from the deadline for the latest ad-hoc data collection.</u>	The additional text shall ensure that Member States will have sufficient time to allocate resources to begin a new ad hoc data collection. If the period of 2 years between each ad-hoc data collection starts by the date of the delegated act enters into force it may not be sufficient time for Member States to plan and execute the next ad-hoc data collection.
3. The Commission may adopt implementing acts to provide:	34 . The Commission may adopt implementing acts to provide:	
(a) a list of variables to be transmitted to the Commission (Eurostat);	(a) a list of variables to be transmitted to the Commission (Eurostat); <u>variables;</u>	The Requirements to ad hoc data collection must be in coherence with the requirements in article 5 par. 10.
(b) the descriptions of variables;	(b) — the descriptions of variables;	
(c) the precision requirements;	(b) e) the precision requirements;	
(d) the data transmission deadlines.	(c) e) the data transmission deadlines.	

<p>Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 15 not later than 12 months before the beginning of the reference year.</p>	<p>Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 16 not later than 12 18 months before the beginning of the reference year.</p>	<p>We suggests to change the period from 12 months to 18 months in order allow sufficient time for the Member State to establish the necessary means to meet the requirements in the implementation regulation.</p>
<p><i>Article 7</i></p>		
<p>Transmission frequency of the data sets</p>		
<p>1. The transmission frequency of the data sets shall be as set out in the Annex. The Commission may adopt implementing acts to further specify each transmission frequency.</p>	<p>1. The transmission frequency of the data sets shall be as set out in the Annex. The Commission may adopt implementing acts to further specify each transmission frequency.</p> <p><u>1. The transmission frequency of the data sets are set out in Annex I.</u></p>	<p>The frequency cannot be changed by an implementing act, so part of the provision was removed. Cf. comments to Article 5 (9).</p>
<p>2. A Member State may be exempted from certain regular transmissions of the data where the impact of the Member State on the EU total of a variable is limited. The Commission may adopt implementing acts defining thresholds for variables according to specific methodology in such a way that the application of those thresholds does not reduce the information on the expected EU total of the variable in</p>	<p>2. A Member State may be exempted from certain regular transmissions of the data where the impact of the Member State on the EU total of a variable is limited. The Commission may adopt implementing acts defining thresholds for variables according to specific methodology in such a way that the application of those thresholds does not reduce the information on the expected EU total of the variable in the reference year by more than 5%.</p>	<p>In order to achieve that for subsectors of agriculture which are of minor importance, it is suggested that the frequency of data transmission can be lowered</p>

<p>the reference year by more than 5%. The thresholds shall be revised so that they correspond to the trends of EU totals, initiated by the Commission (Eurostat).</p>	<p><u>In case of variables with a share of less than [1] percent of EU total value of production of agricultural goods at basic prices, measured at the level of detailed positions of the EAA production account (Annex II part 1 of reg. (EC) no. 138/2004) the Commission shall define thresholds in such a way that the application of these thresholds does not reduce the information on the expected EU total of the variable in the reference year by more than 10 %.</u> The thresholds shall be revised so that they correspond to the trends of EU totals, initiated by the Commission (Eurostat).</p>	
<p>3. The Commission may adopt implementing acts to further specify the following:</p>		
<p>(a) the threshold under which the production of a variable is considered to have a limited impact on the expected EU total aggregate;</p>		
<p>(b) the source of the data and the methodology to be used for defining the threshold;</p>		
<p>c) the variables to which this exemption applies.</p>		

<p>The implementing acts referred to in paragraphs 1, 2 and 3 shall be adopted in accordance with the examination procedure referred to in Article 15(2).</p>	<p>The implementing acts referred to in paragraphs 1, 2 and 3 shall be adopted in accordance with the examination procedure referred to in Article 15 <u>16</u>(2) <u>not later than 12 months before the beginning of the reference period</u>.</p>	
<p><i>Article 8</i></p>		
<p>Data sources and methods</p>		
<p>1. For the purpose of obtaining statistics related to the inputs and outputs of agricultural activities, Member States shall use one or more of the following sources or methods, provided that the information allows for the production of statistics that meet the quality requirements laid down in Article 10:</p>		
<p>(a) statistical surveys or other statistical data collection methods;</p>		
<p>(b) the administrative data sources specified in paragraph 2;</p>		
<p>(c) other sources, methods or innovative approaches.</p>		

<p>2. Member States may use any information from the integrated administration and control system ('IACS') established by Regulation (EU) No 1307/2013 of the European Parliament and of the Council ⁽¹⁹⁾, the system for the identification and registration of bovine animals established by Regulation (EC) No 1760/2000 of the European Parliament and of the Council ⁽²⁰⁾ and the system for the identification and registration of ovine and caprine animals established by Council Regulation (EC) No 21/2004 ⁽²¹⁾, the vineyard register implemented in accordance with Article 145 of</p>	<p>2. Member States may use any information from the integrated administration and control system ('IACS') established by Regulation (EU) No 1307/2013 of the European Parliament and of the Council ⁽²³⁾, the system for the identification and registration of bovine animals established by Regulation (EC) No 1760/2000 of the European Parliament and of the Council ⁽²⁴⁾ and the system for the identification and registration of ovine and caprine animals established by Council Regulation (EC) No 21/2004 ⁽²⁵⁾, the vineyard register implemented in accordance with Article 145 of Regulation (EU) No 1308/2013 of the European Parliament and of the Council</p>	<p>Adding "any other administrative data defined in the EU-legislation" secures that Member States may use all relevant administrative data collected and compiled according to EU legislation and not only according Regulation mentioned here. By adding the phrase '..., or any other administrative data defined in EU legislation' Member States will be given a broader opportunity to reduce the burden.</p>
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¹⁹ Regulation (EU) No 1307/2013 of the European Parliament and of the Council of 17 December 2013 establishing rules for direct payments to farmers under support schemes within the framework of the common agricultural policy and repealing Council Regulation (EC) No 637/2008 and Council Regulation (EC) No 73/2009 (OJ L 347, 20.12.2013, p. 608).

²⁰ Regulation (EC) No 1760/2000 of the European Parliament and of the Council of 17 July 2000 establishing a system for the identification and registration of bovine animals and regarding the labelling of beef and beef products and repealing Council Regulation (EC) No 820/97 (OJ L 204, 11.8.2000, p. 1).

²¹ Council Regulation (EC) No 21/2004 of 17 December 2003 establishing a system for the identification and registration of ovine and caprine animals and amending Regulation (EC) No 1782/2003 and Directives 92/102/EEC and 64/432/EEC (OJ L 5, 9.1.2004, p. 8).

²³ Regulation (EU) No 1307/2013 of the European Parliament and of the Council of 17 December 2013 establishing rules for direct payments to farmers under support schemes within the framework of the common agricultural policy and repealing Council Regulation (EC) No 637/2008 and Council Regulation (EC) No 73/2009 (OJ L 347, 20.12.2013, p. 608).

²⁴ Regulation (EC) No 1760/2000 of the European Parliament and of the Council of 17 July 2000 establishing a system for the identification and registration of bovine animals and regarding the labelling of beef and beef products and repealing Council Regulation (EC) No 820/97 (OJ L 204, 11.8.2000, p. 1).

²⁵ Council Regulation (EC) No 21/2004 of 17 December 2003 establishing a system for the identification and registration of ovine and caprine animals and amending Regulation (EC) No 1782/2003 and Directives 92/102/EEC and 64/432/EEC (OJ L 5, 9.1.2004, p. 8).

<p>Regulation (EU) No 1308/2013 of the European Parliament and of the Council ⁽²²⁾, and the organic farming registers set up pursuant to Regulation (EU) 2018/848.</p>	<p>⁽²⁶⁾, and the organic farming registers set up pursuant to Regulation (EU) 2018/848 <u>or any other administrative data defined in the EU-legislation and national legislation.</u></p>	
<p>3. The statistics on plant protection products as referred to in Article 5(1), point (d)(iii) shall be provided using the records kept and made available in accordance with Article 67 of Regulation (EC) No 1107/2009.</p>	<p>3. The statistics on plant protection products as referred to in Article 5(1), point (d)(iii) shall <u>may</u> be provided using the records kept and made available in accordance with Article 67 of Regulation (EC) No 1107/2009.</p>	<p>Scrutiny reservation: The purpose of Regulation 1107/2009 is to ensure a high level of protection of both human and animal health and the environment and to improve the functioning of the internal market through the harmonisation of the rules on the placing on the market of plant protection products, while improving agricultural production“. The purpose is not to produce statistics. So why this reference? Art. 67 of Reg. 1107/2009 does not prescribe a certain format for the records to be kept by users of PPP while the proposal for Art. 8(4) of SAIO foresees to oblige users to deliver electronic records.</p> <ul style="list-style-type: none"> – If the Commission sees a necessity to use electronic records,

²² Regulation (EU) No 1308/2013 of the European Parliament and of the Council of 17 December 2013 establishing a common organisation of the markets in agricultural products and repealing Council Regulations (EEC) No 922/72, (EEC) No 234/79, (EC) No 1037/2001 and (EC) No 1234/2007 (OJ L 347, 20.12.2013, p. 671).

²⁶ Regulation (EU) No 1308/2013 of the European Parliament and of the Council of 17 December 2013 establishing a common organisation of the markets in agricultural products and repealing Council Regulations (EEC) No 922/72, (EEC) No 234/79, (EC) No 1037/2001 and (EC) No 1234/2007 (OJ L 347, 20.12.2013, p. 671).

		<p>would it not be a nearby way to change the <i>specialised law</i>?</p> <ul style="list-style-type: none"> - The obligation to deliver electronic records would create a big burden for many users of PPP. Why should this be done for statistical purposes when it is not necessary in <i>specialised law</i>? <p>It is not a purpose of European statistics to control the behaviour of farmers, but such an image would be created if the proposal would be realised. This would have negative consequences on the willingness of farmers to provide information and thus on the quality of results.</p> <p>Art. 67 of Reg. 1107/2009 creates an obligation to keep records for <u>all</u> users named there. What is the idea of the COM concerning the number of users (sample size) which would be obliged to deliver electronic records following Art. 8(4) of SAIO?</p> <p>Besides these points, Art. 8(3), 8(4) mean an input harmonisation which is unusual for European Statistics. In addition, since Art. 8(3) stipulates (by reference to Article 5(1), point (d)(iii)) that <u>both</u> detailed topics of the topic „PPP“, thus including the statistics on PPP placed on the market, shall be provided using the records kept and made available in accordance with</p>
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		Article 67 of Regulation (EC) No 1107/2009. This would mean a big complication of the latter statistics which is right now created from data collected by companies which produce or import PPP.
4. For that purpose, the Member States shall request from professional users of plant protection products, in electronic format, records covering at least the name of the plant protection product, the dose of application, the main area and the crop where the plant protection product was used in accordance with this Regulation.		Scrutiny reservation See above.
5. Member States which decide to use the sources, methods or innovative approaches referred to in point (c) of paragraph 1 shall inform the Commission (Eurostat) during the year preceding the reference year during which the source, method or innovative approach will be introduced, and shall provide details concerning the quality of the data obtained.		
6. National authorities responsible for complying with the requirements of this Regulation shall have the right to access and use, promptly and free of charge, data,		

<p>including individual data on enterprises and agricultural holdings in administrative files compiled on their national territory pursuant to Article 17a of Regulation (EC) No 223/2009. The national authorities and the owners of the administrative records shall establish the necessary cooperation mechanisms for such access. That access shall also be granted in cases where the competent authority has delegated tasks to be carried out on its behalf to private or semi-public bodies.</p>		
<p><i>Article 9</i></p>		
<p>Reference period</p>		
<p>The information collected shall refer to a single reference period that is common to all Member States by a reference to the situation during a specified timeframe.</p>		<p>We are of the opinion that in view of its nature and impact <u>the reference period</u> is an essential element. Therefore the legislator should not delegate these parts of its own power to the Commission.</p> <p>In addition, in the statistical domain, we consider that from a policy and political perspective, elements are to be classified as essential if they have considerable effects on the costs involved in data collection or on the burden placed on respondents in the Member States.</p>

		<p>Furthermore, we do not see the need and necessity what further to specify the reference periods mentioned in Annex I.</p> <p>However, the implementing acts should regulate the reference period both of the new data stemming from modification of the detailed topics list as well as data which reference period was not specified in the Annex I (with 5 year frequency).</p>
<p>The reference period for each detailed topic shall be as specified in the Annex. The first reference periods shall begin in calendar year <i>[insert the year starting on 1 January following 18 months after adoption]</i>.</p>	<p>The reference period for each detailed topic shall be as specified in the Annex I. The first reference periods shall begin in calendar year <i>[insert the year starting on 1 January following 18 months after adoption]</i>.</p>	
<p>The Commission may adopt implementing acts to further specify the reference periods. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 15(2).</p>	<p>The Commission may adopt implementing acts to further specify the reference periods <u>of new data sets reflecting the revision of Annex I based on Art. 5.9 and of data sets which reference period is not specified in Annex I.</u> Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 15 <u>16(2) not later than 18 months from the beginning of the reference period.</u></p>	

<i>Article 10</i>		
Quality and quality reporting		
1. Member States shall take the necessary measures to ensure the quality of the data and metadata transmitted.		
2. Member States shall ensure that the data obtained using the sources and methods laid down in Article 8 give accurate estimates on the statistical population defined in Article 3 at national level, and, where required, at regional level.		
3. For the purpose of this Regulation, the quality criteria defined in Article 12(1) of Regulation (EC) No 223/2009 shall apply.		
4. The Commission (Eurostat) shall assess the quality of the data and metadata transmitted in a transparent and verifiable way.		
5. For that purpose, Member States shall transmit a quality report describing the statistical processes to the Commission (Eurostat), for the first time by 31 December of the year <i>[insert the</i>	5. For that purpose, Member States shall transmit a quality report describing the statistical processes to the Commission (Eurostat), for the first time by 31 December of the year <i>[insert the year</i>	

<p><i>year starting 1 January following 30 months after adoption], and thereafter every 3 years, for the data sets transmitted during the period, including in particular:</i></p>	<p><i>starting 1 January following 30 months after adoption], and thereafter every 3 5 years, for the data sets transmitted during the period, including in particular.</i></p>	
<p>(a) metadata describing the methodology used and how technical specifications were achieved by reference to those laid down by this Regulation;</p>		
<p>(b) information on compliance with the coverage requirements as described in Article 4, including in developing and updating it.</p>		
<p>6. Separate methodological reports for the detailed topic ‘<i>Weights and re-based indices</i>’ shall be transmitted at the same time as the data.</p>	<p>6. Separate methodological reports for the detailed topic ‘<i>Weights and re-based indices</i>’ shall be transmitted at the same time as the data.</p> <p><u>For the topic of agricultural price indices as referred to in Article 5(1), point (c), the quality reports shall be transmitted every 5 years together with the weights and rebased indices, but not earlier than 31 December of the year [insert the year starting 1 January following 30 months after adoption].</u></p>	<p>It has to be in line with the period of price rebasing.</p>

<p>7. The Commission may adopt implementing acts setting out the practical arrangements for the quality reports and their contents. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 15(2).</p>	<p>7. The Commission may adopt implementing acts setting out the practical arrangements for the quality reports and their contents. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 15 <u>16</u>(2) <u>and shall not impose significant additional burdens or costs on the Member States.</u></p>	<p>Safeguard added.</p>
<p>8. Member States shall, where necessary, inform the Commission (Eurostat) about any relevant information or changes with regard to the implementation of this Regulation that could significantly influence the quality of the data transmitted.</p>		
<p>9. At the request of the Commission (Eurostat), Member States shall provide necessary additional clarification to evaluate the quality of the statistical information.</p>		
	<p><u>Article [11] (new)</u> <u>Feasibility and pilot studies</u></p>	
	<p><u>1) In accordance with the objectives of this Regulation and where the new data requirements or improvement needs are identified, the Commission</u></p>	<p>We recognise the need for future developments with regard to the production of high quality and comparable European statistics in order to</p>

	<p><u>(Eurostat) shall, where necessary, launch feasibility and pilot studies, to be carried out on a voluntary basis by the Member States, in order to:</u></p> <ul style="list-style-type: none"> a) <u>test the feasibility of new data collections, including the availability of appropriate data sources and production techniques, statistical quality and comparability and the costs and burdens involved,</u> b) <u>develop and implement new detailed topics for the collection of data in accordance with Article 5 (9) point (d).</u> c) <u>develop and implement ad hoc data requirements in accordance with Article 6</u> 	<p>support the Union policies, such as the European Green Deal with the underlying farm to fork and biodiversity strategies.</p> <p>However, we have concerns regarding the implications of introducing future new data collections pursuant to article 5(9) point (d) and article 6. These concerns are e.g. linked to developing and producing new statistics underpinning the European Green Deal with the underlying farm to fork and biodiversity strategies,</p> <p>In addition, the future development, production and dissemination of new data collections intended under Article 5(8) point (e) and Article 6 might impose additional production costs on Member States authorities and response burden on the agricultural sector.</p> <p>In addition, the availability of reliable data sources and production techniques, for collecting and producing data on the abovementioned strategies should be taken into account.</p> <p>Therefore, we propose that pilot studies should be carried out, exploring the feasibility of producing new statistics.</p>
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		<p>Finally, we are of the opinion that introducing pilot studies is entirely in accordance with the Annex II on European statistics of the Single Market programme. See under chapter sustainable development, natural resources and environment. It includes the following. “Where the development of new statistics and indicators for the topics mentioned in the intend above is necessary, the data availability and the feasibility for producing statistics and indicators shall be further examined within the European Statistical System”. (Council document 14258/20 dated 18 December 2020)</p>
	<p><u>2) Before launching each particular feasibility and pilot study, the Commission (Eurostat) shall assess whether the new statistics can be based on the information available in the relevant administrative sources at Union level in order to harmonise the concepts used, where possible, and in order to minimise additional burdens on national statistical institutes and other national authorities and enhance the use of existing data in accordance with Article 17a of Regulation (EC) No 223/2009.</u></p>	

	<u>3) The Commission (Eurostat) shall provide to the Member States that carry out feasibility or pilot studies appropriate financing in accordance with Article 12.</u>	
	<u>4) The results of the feasibility and pilot studies referred to in paragraph 1 shall be evaluated by the Commission (Eurostat) in cooperation with Member States and the main users of the data sets.</u>	
<i>Article 11</i>	<i>Article 11 12</i>	
Union contribution		
1. For the implementation of this Regulation, the Union may provide grants to the national statistical institutes and other national authorities referred to in Article 5(2) of Regulation (EC) No 223/2009 in order to cover the implementation costs of an ad hoc data collection.	1. For the implementation of this Regulation, the Union shall may provide grants to the national statistical institutes and other national authorities referred to in Article 5(2) of Regulation (EC) No 223/2009 in order to cover the <u>costs of implementation of this regulation as well as the costs of an ad hoc data collection, and the costs of feasibility and pilot studies as referred to in Article 11 [new article].</u>	SAIO integrates many existing Gentlemen's Agreements and ESSC-agreements into a legal base. Member States may not have been a part of the various agreements or Member States have not complied with the data requirements in all agreements, and therefore Member States do not have sufficient statistical systems to meet the requirements in SAIO. These Member States will have to establish new statistical systems in order to comply with the new legal requirements. Establishing new statistical systems require investments why co-financing to meet the new requirements is needed.

2. The Union financial contribution shall not exceed 90% of the eligible costs.		
<i>Article 12</i>	<i>Article 12 13</i>	
Protection of the financial interests of the Union		
1. The Commission shall take appropriate measures to ensure that, when actions financed under this Regulation are implemented, the financial interests of the Union are protected by the application of preventive measures against fraud, corruption and any other illegal activities, by effective checks and, if irregularities are detected, by the recovery of the amounts wrongly paid and, where appropriate, by effective, proportionate and dissuasive administrative and financial penalties.		
2. The Commission or its representatives and the Court of Auditors shall have the power of audit, on the basis of documents and on-the-spot checks, over all grant beneficiaries, contractors and subcontractors who have received Union funds under the programme.		

<p>3. The European Anti-Fraud Office (OLAF) may carry out investigations, including on-the-spot checks and inspections, in accordance with the provisions and procedures laid down in Regulation (EU, Euratom) No 883/2013 of the European Parliament and of the Council ⁽²⁷⁾ and Council Regulation (Euratom, EC) No 2185/96 ⁽²⁸⁾ with a view to establishing whether there has been fraud, corruption or any other illegal activity affecting the financial interests of the Union in connection with a grant agreement or grant decision or contract funded under the programme.</p>		
<p>4. Without prejudice to paragraphs 1, 2 and 3, cooperation agreements with third countries and with international organisations, contracts, grant agreements and grant decisions resulting from the implementation of this Regulation shall contain provisions expressly empowering the Commission, the Court of Auditors and</p>		

²⁷ Regulation (EU, Euratom) No 883/2013 of the European Parliament and of the Council of 11 September 2013 concerning investigations conducted by the European Anti-Fraud Office (OLAF) and repealing Regulation (EC) No 1073/1999 of the European Parliament and of the Council and Council Regulation (Euratom) No 1074/1999 (OJ L 248, 18.9.2013, p. 1).

²⁸ Council Regulation (Euratom, EC) No 2185/96 of 11 November 1996 concerning on-the-spot checks and inspections carried out by the Commission in order to protect the European Communities' financial interests against fraud and other irregularities (OJ L 292, 15.11.1996, p. 2.)

<p>OLAF to conduct such audits, and investigations, in accordance with their respective competences.</p>		
<p><i>Article 13</i></p>	<p><i>Article 14</i></p>	
<p>Derogations</p>		
<p>1. Where the application of this Regulation or of the implementing measures and delegated acts adopted pursuant to them necessitates major adaptations in a national statistical system of a Member State, the Commission may adopt implementing acts granting derogations to Member States for a maximum duration of two years.</p>	<p>1. Where the application of this Regulation or of the implementing measures and delegated acts adopted pursuant to them necessitates major adaptations in a national statistical system of a Member State, the Commission may adopt implementing acts granting derogations to Member States for a maximum duration of two <u>three</u> years.</p>	
<p>The relevant Member State shall submit a duly reasoned request for such a derogation to the Commission within three months of the date of the entry into force of the act concerned.</p>	<p>The relevant Member State shall submit a duly reasoned request for such a derogation to the Commission within three months of the date of the entry into force of the act concerned.</p> <p><u>2. Where a derogation as referred to in paragraph 1 remains justified by sufficient evidence at the end of the period for which it was granted, the Commission may, by means of implementing acts, grant a subsequent derogation for a maximum period of two years.</u></p>	

<p>The impact of such derogations on the comparability of Member States' data or on the calculation of the required timely and representative European aggregates shall be kept to a minimum. The burden on respondents shall be taken into account when granting the derogation.</p>	<p>The impact of such derogations on the comparability of Member States' data or on the calculation of the required timely and representative European aggregates shall be kept to a minimum. The burden on respondents shall be taken into account when granting the derogation.</p>	<p>This wording implies that a large MS couldn't have a derogation because it will always affect to the comparability of the EU aggregates.</p>
	<p><u>3. For the purpose of a derogation as referred to in paragraphs 1 and 2 the relevant Member State shall submit a duly reasoned request for such a derogation to the Commission within three months of the date of the entry into force of the act concerned.</u></p>	
<p>2. The implementing acts referred to in paragraph 1, first subparagraph shall be adopted in accordance with the examination procedure referred to in Article 15(2).</p>	<p>3. The implementing acts referred to in paragraph 1, first subparagraph shall be adopted in accordance with the examination procedure referred to in Article 15 <u>16</u> (2).</p>	
<p><i>Article 14</i></p>	<p><i>Article 14 <u>15</u></i></p>	
<p>Exercise of delegation</p>		
<p>1. The power to adopt delegated acts is conferred on the Commission subject to the conditions laid down in this Article.</p>		

<p>2. The power to adopt delegated acts referred to in Article 5(8) and Article 6(1 and 2) shall be conferred on the Commission for an undetermined period from <i>[Publications Office: please insert exact date of entry into force of the Regulation]</i>.</p>	<p>2. The power to adopt delegated acts referred to in Article 5(8) and Article 6(1 and 2) shall be conferred on the Commission for <u>a period of five years</u> an undetermined period from <i>[Publications Office: please insert exact date of entry into force of the Regulation]</i>. <u>The Commission shall draw up a report in respect of the delegation of power not later than nine months before the end of the five-year period. The delegation of power shall be tacitly extended for periods of an identical duration, unless the European Parliament or the Council opposes such extension not later than three months before the end of each period.</u></p>	<p>We cannot support that the Commission is empowered for an undetermined period. The empowerment should be five years and shall be tacitly extended. In statistical legislation this is common practice.</p> <p>The second paragraph is needed when limited the delegation to a specific period. (text from IFS article 16).</p>
<p>3. The delegation of power referred to in Article 5(8) and Article 6(1 and 2) may be revoked at any time by the European Parliament or by the Council. A decision to revoke shall put an end to the delegation of the power specified in that decision. It shall take effect the day following the publication of the decision in the Official Journal of the European Union or at a later date specified therein. It shall not affect</p>		

<p>the validity of any delegated acts already in force.</p>		
<p>4. Before adopting a delegated act, the Commission shall consult experts designated by each Member State in accordance with the principles laid down in the Inter-institutional Agreement of 13 April 2016 on Better Law-Making.</p>		
<p>5. As soon as it adopts a delegated act, the Commission shall notify it simultaneously to the European Parliament and to the Council.</p>		
<p>6. A delegated act adopted pursuant to Article 5(8) and Article 6(1 and 2) shall enter into force only if no objection has been expressed either by the European Parliament or by the Council within a period of two months of notification of that act to the European Parliament and the Council or if, before the expiry of that period, the European Parliament and the Council have both informed the Commission that they will not object. That period shall be extended by two months at the initiative of the European Parliament or of the Council.</p>		

<i>Article 15</i>	<i>Article 15 <u>16</u></i>	
Committee procedure		
1. The Commission shall be assisted by the European Statistical System Committee established by Regulation (EC) No 223/2009. That committee shall be a committee within the meaning of Regulation (EU) No 182/2011.		
2. Where reference is made to this paragraph, Article 5 of Regulation (EU) No 182/2011 shall apply.		
<i>Article 16</i>	<i>Article 16 <u>17</u></i>	
Amendment to Regulation (EC) No 617/2008		
Regulation (EC) No 617/2008 is amended as follows:		
(1) in Article 8, paragraphs 3, 4 and 5 are deleted;		
(2) Article 11 is deleted;		
(3) Annex III and IV are deleted.		

This amendment shall apply from 1 January <i>[of the year following 18 months after adoption]</i> .		
<i>Article 17</i>	<i>Article 17 18</i>	
Repeals		
1. Regulations (EC) No 1165/2008, (EC) No 543/2009, (EC) No 1185/2009 and Directive 96/16/EC are repealed with effect from 1 January <i>[of the first calendar year starting at least 18 months after adoption]</i> .		
2. References to the repealed acts shall be construed as references to this Regulation.		
<i>Article 18</i>	<i>Article 18 19</i>	
Entry into force		
This Regulation shall enter into force on the twentieth day following that of its publication in the <i>Official Journal of the European Union</i> .		
It shall apply from 1 January <i>[of the year following 18 months after adoption]</i> .		

This Regulation shall be binding in its entirety and directly applicable in all Member States.		
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ANNEX I

ANNEX (kindly amend the annex using the track changes and comments features)

Domains, topics and detailed topics, and transmission frequencies and reference periods per detailed topic

(a) Animal production statistics

Topic	Detailed topic	Frequencies	Reference periods	Comments
Livestock and meat	Livestock populations	Twice per year, annual or three times per decade	Dates	Needs to be specified to which reference period refers. each frequency. Sub-annually means reporting provisional data and early estimates - is it clear enough that it is always data relating to a calendar year?
		<u>Twice per year</u>		
		<u>Annual</u>		
		<u>Three times per decade</u>		
	Meat production	Monthly	Calendar month	
		Annually	Calendar year	
	Animal delivery		Twice per year or annually	Calendar quarters Calendar half years Calendar years
<u>Twice per year</u>			<u>Calendar quarters</u>	Needs to be specified to which reference period refers each frequency. Sub-annually means reporting provisional data and early

			<u>Calendar half years</u> <u>Calendar years</u>	estimates - is it clear enough that it is always data relating to a calendar year?
		<u>Annually</u>	<u>Calendar quarters</u> <u>Calendar half years</u> <u>Calendar years</u>	Needs to be specified to which reference period refers each frequency. Sub-annually means reporting provisional data and early estimates - is it clear enough that it is always data relating to a calendar year?
Eggs and chicks	Eggs for consumption	Annually or three times per decade	Calendar year	Needs to be specified to which reference period refers each frequency. Sub-annually means reporting provisional data and early estimates - is it clear enough that it is always data relating to a calendar year?
		<u>Annually</u>		
		<u>Three times per decade</u>		
	Eggs for hatching and poultry chicks	Monthly	Calendar month	
	Structure of hatcheries	Annually	Calendar year Dates	According to Annex IV of the current Regulation (617/2008) the structure and utilisation of hatcheries is referring to the hatcheries which were operating in the previous year. Therefore in SAIO in case of this data set „Dates” as reference period should be deleted, only calendar year should remain.

Milk and milk products	Milk produced and used on the agricultural holdings	Annually or three times per decade	Calendar year	Needs to be specified to which reference period refers each frequency. Sub-annually means reporting provisional data and early estimates - is it clear enough that it is always data relating to a calendar year?
		Annually		
		Three times per decade		
	Milk availabilities to the dairy sector	Annually	Calendar year	
	Uses of milk and dairy materials by the dairy sector and resulting products	Annually	Calendar year	
Monthly uses of cow's milk by the dairy sector	Monthly or twice per year	Calendar month		
	Monthly			
	Twice per year			
Structure of the dairy enterprises	Three times per decade	Calendar year		

(b) Crop production statistics

Topic	Detailed topic	Frequencies	Reference periods	Comments
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Crop production	Arable crop production and permanent grassland	Sub-annually and annually	Calendar year	
	Horticulture production excluding permanent crops	Sub-annually and annually	Calendar year	
	Permanent crop production	Sub-annually and annually	Calendar year	
Crops - main area	<u>UAA, arable land and permanent grassland</u>	Annually	Calendar year	<p>Separation because of different deadlines (see Annex II)</p> <p>Needs to be specified to which reference period refers each frequency. Sub-annually means reporting provisional data and early estimates - is it clear enough that it is always data relating to a calendar year?</p>
	<u>Horticultural crops</u>	Annually	Calendar year	
<u>Crop production on arable land and permanent grassland not specifying regional and organic production</u>	<u>Production on arable land, excluding horticulture</u>	<u>Sub-annually</u> <u>Annually</u>	<u>Calendar year</u>	
	<u>Production on permanent grassland</u>	<u>Sub-annually</u> <u>Annually</u>	<u>Calendar year</u>	
<u>Crop production on arable land and permanent grassland specifying regional and organic production</u>	<u>Regional and organic production on arable land, excluding horticulture</u>	<u>Annually</u>	<u>Calendar year</u>	
	<u>Regional and organic production on permanent grassland</u>	<u>Annually</u>	<u>Calendar year</u>	
<u>Horticulture production only vegetables, fruits,</u>	<u>Horticulture production of</u>	<u>Sub-annually</u>	<u>Calendar year</u>	

<u>berries and nuts not specifying regional and organic production</u>	<u>vegetables, fruits, berries and nuts</u>	<u>Annually</u>		
<u>Horticulture production only vegetables, fruits, berries and nuts specifying regional and organic production</u>	<u>Organic and regional production of vegetables fruits, berries and nuts.</u>	<u>Annually</u>	<u>Calendar year</u>	
<u>Horticulture production of citrus fruits, grapes and olives</u>	<u>Production of citrus fruits, grapes, olives and permanent crops for human consumption</u>	<u>Sub-annually</u>	<u>Calendar year</u>	
		<u>Annually</u>		
Crop balances	Cereal balances	Annually	Year	
	Oil seeds balances	Annually	Year	
Grasslands and grazing	Management of grazed areas	Every 3 years <u>Every 5 years</u>	Calendar year	There is great uncertainty regarding the content of this topic and detailed topic. The Commission argues in the recitals that this topic is related to monitoring climate changes,

				therefore we suggest that deadline is similar to the deadline of the topic “Nutrient Balances”.
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(c) Agricultural price statistics

Topic	Detailed topic	Frequencies	Reference periods	Comments
Agricultural price indices	Early and achieved indices	Quarterly and annually	Calendar quarter Calendar year	
	Weights and re-based indices	Every 5 years	Calendar quarter Calendar year	In order to establish a generic model for deadlines for final data, see annex II, it is necessary to establish a new topic for the detailed topic “weights and re-based indices” since the deadlines are 3 years after the reference period.
<u>Price weights and re-basing</u>	<u>Weights and re-based indices</u>	<u>Every 5 years</u>	<u>Calendar quarter Calendar year</u>	In order to establish a generic model for deadlines for final data, see annex II, it is necessary to establish a new topic for the detailed topic

				“weights and re-based indices” since the deadlines are 3 years after the reference period. We suggest to establish a new topic “Price weights and re-basing”.
Absolute input prices	Fertilisers	Annually	Calendar year	
	Feedingstuff	Annually	Calendar year	
	Energy	Annually	Calendar year	
Agricultural land prices and rents	Agricultural land prices	Annually	Calendar year	
	Agricultural land rents	Annually <u>Every 3 years</u>	Calendar year	We suggest that the frequency is set to every 3 years. In order to give the opportunity to the Member states to collect data on rents in IFS and to limit the burden on respondents and Member States the frequency should be aligned to IFS. Further, the changes in agricultural land rents (average data) over time is relatively modest.

(d) Statistics on nutrients and plant protection products

Topic	Detailed topic	Frequencies	Reference periods	Comments
Nutrients in agricultural fertilisers Nutrients in fertilisers for agriculture	Inorganic fertilisers for agriculture	Annually	Calendar year Year	There are different approaches in Member States to obtain this information where some rely on data in Calendar year and other rely on business year. It is therefore suggested to keep the flexibility for Member States by allowing both methods in order to reduce the burden for respondents and Member States.
	Organic fertilisers for agriculture	Annually Every 5 years	Year	<p>Member States have concern regarding collecting data on organic fertilizers. The burden for respondents and Member States is foreseen to increase significantly.</p> <p>Data are envisaged to be used for nutrient balances and as such we suggest to extend the frequency to 5 years similar to the topic “Nutrient Balances”.</p>
	Crops and forage nutrient			

Nutrient balances	contents coefficients	Every five years	Calendar year	
	Crop residue volumes and nutrient content coefficients			
	Biological nitrogen fixation coefficients			
	Atmospheric nitrogen deposition coefficients			
	Seed use nutrient content coefficients			
	Livestock excretion nutrient coefficients			
	Livestock manure withdrawal volumes and nutrient content coefficients			

Plant protection products	Plant protection products placed on the market	Annually	Calendar year	
	Use of plant protection products in agriculture	Annually	Calendar year	<p>At present we place a general scrutiny reservation on the proposals with regard to the plant productions products. See also recital 12, article 4 (4), article 8 (3) and article 8 (4)</p> <p>It needs to be emphasised that if data used for the these statistics cannot be obtained from available administrative sources, but must be collected by surveys, the proposal will lead to an tremendous increase in the administrative burden and production costs.</p>

ANNEX II

Domains, topics and reference periods and deadlines

(a) Animal production statistics

<u>Topic</u>	<u>Reference period</u>	<u>Deadline (end of reference period)</u>	Comments
<u>Livestock and meat</u>	<u>Dates</u>	<u>5 months</u>	
	<u>Monthly</u>	<u>3 months</u>	
	<u>Half year</u>	<u>6 months</u>	
	<u>Yearly</u>	<u>9 months</u>	
<u>Eggs and chicks</u>	<u>Monthly</u>	<u>3 months</u>	
	<u>Yearly</u>	<u>9 months</u>	
<u>Milk and milk products</u>	<u>Monthly</u>	<u>3 months</u>	
	<u>Half year</u>	<u>6 months</u>	
	<u>Yearly</u>	<u>9 months</u>	

(b) Crop production statistics

<u>Topic</u>	<u>Reference period</u>	<u>Deadline (end of reference period)</u>	Comments
<u>Crops - main area</u>	<u>Calendar year</u>	<u>9 months</u>	It is suggested to keep the existing legal obligation with a deadline of 9 months in order

			to have only one production proces. Regional data is included.
<u>Crop production on arable land and permanent grassland not specifying regional and organic production</u>	<u>Calendar year</u>	<u>9 months</u>	It is suggested to keep the existing legal obligation with a deadline of 9 months in order to have only one production proces.
<u>Crop production on arable land and permanent grassland specifying regional and organic production</u>	<u>Calendar year</u>	<u>9 months</u>	It is new. It is suggested to keep the existing deadline for crop production in order have sufficient time to produce figures on regional and organic production.
<u>Horticulture production only vegetables, fruits, berries and nuts not specifying regional and organic production</u>	<u>Calendar year</u>	<u>3 months</u>	The existing legal obligation.

<u>Horticulture production only vegetables, fruits, berries and nuts specifying regional and organic production</u>	<u>Calendar year</u>	<u>6 months</u>	This is a new requirement and it is foreseen that dividing data at regional level and organic production will require longer production time.
<u>Horticulture production only citrus fruits, grapes and olives</u>	<u>Calendar year</u>	<u>9 months</u>	It is not possible to send regional and organic production earlier why the existing deadline is proposed.
<u>Crop balances</u>	<u>Year</u>	<u>18 months</u>	Data sources not ready – we need foreign trade figures for the balances.
<u>Grassland and grazing</u>	<u>Calendar year</u>	<u>18 months</u>	Difficulties identifying data sources – may be a need for surveys.

(c) Agricultural price statistics

<u>Topic</u>	<u>Reference period</u>	<u>Deadline (end of reference period)</u>	<u>Comments</u>
<u>Agricultural price indices</u>	<u>Calendar year</u>	<u>6 months</u>	

	<u>Quarterly</u>	<u>3 months</u>	
<u>Price weights and re-basing</u>	<u>Calendar year (base year B)</u>	<u>B+3 year 31 DEC</u>	
	<u>Quarterly</u>	<u>B+3 year 31 DEC</u>	
<u>Absolute input prices</u>	<u>Calendar year</u>	<u>6 months</u>	
<u>Agricultural land prices and rents</u>	<u>Calendar year</u>	<u>12 months</u>	

(d) Statistics on nutrients and plant protection products

<u>Topic</u>	<u>Reference period</u>	<u>Deadline (end of reference period)</u>	<u>Comments</u>
<u>Nutrients in fertilisers for agriculture</u>	<u>Year</u>	<u>15 months</u>	We suggests 15 months as a deadline due to data availability.
<u>Nutrient balances</u>	<u>Calendar year</u>	<u>24 months</u>	We suggests a deadline of 24 months due to data availability and complexity. It is expected to be research institutions that will carry out the work.
<u>Plant protection products</u>	<u>Calendar year</u>	<u>12 months</u>	