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### **GreenData4All Initiative: Concerns and Recommendations from the European Landowners' Organization**

The European Landowners' Organization (ELO) recognizes the importance of environmental data sharing for informed decision-making and sustainable development. As stewards of the land, we understand the significance of initiatives like GreenData4All in facilitating access to environmental information. However, we also have concerns regarding the potential implications of this initiative on landowners and farmers, particularly regarding data and property rights.

Our feedback aligns with the following key points:

**Data Rights:** Landowners are concerned about the ownership and control of data generated on their land. There is a need for clarification regarding who holds the rights to environmental data collected from private properties. The initiative must ensure that landowners retain sovereignty over data originating from their land and have a say in how it is used and shared. This calls for clear guidelines for data ownership and use, including provisions for fair compensation for data sharing.

**Property Rights:** GreenData4All should not infringe upon property rights by requiring compulsory data sharing without adequate compensation or consent from landowners. There is a risk that increased data sharing requirements could impose additional burdens on landowners, affecting their autonomy and property rights. The initiative should therefore establish mechanisms for obtaining informed consent from landowners before collecting data on their property.

**Impact on Landowners and Farmers:** The ELO expresses concern over the potential administrative burdens and financial costs that landowners and farmers may face in complying with data sharing obligations. It is worth noting that there already exists the Farm Sustainability Data Network, which facilitates data sharing. Introducing additional requirements may exacerbate administrative burdens.

**Ensure Transparency and Accountability:** GreenData4All should establish transparent processes for data collection, sharing, and use to build trust among landowners and farmers. Mechanisms for accountability to address concerns related to the misuse or unauthorized access to environmental data should be in place.

The European Landowners' Organization recognizes the potential benefits of the GreenData4All initiative but emphasizes the importance of safeguarding data rights and property rights of landowners and farmers. By addressing these concerns and implementing the recommended measures, the initiative can foster a collaborative approach to environmental data sharing that respects the interests and rights of all stakeholders involved.

We applaud efforts to promote transparency and innovation in environmental data management and stand ready to collaborate with policymakers to ensure that the GreenData4All initiative aligns with the principles of fairness, accountability, and respect for property rights.

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