

MONITORING CEREAL STOCKS IN A PERFORMANCE-BASED CAP: THE ITALIAN ‘GRANAIO ITALIA’ REGISTER IN THE EU FRAMEWORK

MONITOROVANIE ZÁSOb OBILNÍN VO VÝKONNOSTNEJ SPP: TALIAŇSKY REGISTER „GRANAIO ITALIA“ V RÁMCI EÚ

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I Introduction

Why the “Granaio Italia” System Was Created?

The “Granaio Italia” system was introduced at a time when both national and European policy makers increasingly feel the need for timely and granular data on cereal production and stocks, in order to

manage markets characterised by high price volatility, geopolitical tensions, and growing concern about the security of supply. Recent crises – the Covid-19 pandemic, the war in Ukraine, disruptions in grain trade routes, and sharp increases in production costs – have clearly shown that purely ex post, aggregate statistics are no longer sufficient to support effective policy decisions: near real-time monitoring tools are

Abstract (EN)

The Italian “Granaio Italia” system is a newly established national electronic cereal stock register, integrated into the National Agricultural Information System (SIAN) and addressed to farms, cooperatives, storage facilities and commercial operators exceeding product-specific thresholds. Although formally conceived as a quarterly reporting obligation on physical cereal stocks, it functions substantively as an information infrastructure supporting agricultural and market policies at both the national and EU levels. The article reconstructs its regulatory genesis from the 2021 Budget Law to the most recent implementing decrees, and analyses its material and personal scope, as well as the operational rules for electronic reporting, including the role of agricultural assistance centres and the interaction with internal management systems. Particular attention is devoted to key interpretative issues (identification of obligated operators, annual thresholds versus quarterly reporting, coordination with other mandatory records) and to the sanctioning regime, now fully operational. Finally, the system is situated within the EU framework on common market organization, agricultural statistics (including SAIO), and the CAP 2023–2027 delivery model, with comparative references to other Member States.

Abstrakt (SK)

Taliancky systém „Granaio Italia“ je novovytvorený národný elektronický register zásob obilnín, integrovaný do Národného poľnohospodárskeho informačného systému (SIAN) a určený pre poľnohospodárske podniky, družstvá, skladovacie zariadenia a obchodných prevádzkovateľov, ktorí prekračujú prahové hodnoty špecifické pre daný produkt. Hoci bol formálne koncipovaný ako štvrťročná nahlasovacia povinnosť o fyzických zásobách obilnín, v podstate funguje ako informačná infraštruktúra podporujúca poľnohospodárske a trhové politiky na národnej aj európskej úrovni. Príspevok rekonštruje jeho regulačný vznik od zákona o rozpočte na rok 2021 až po najnovšie vykonávacie nariadenia a analyzuje jeho vecný a osobný rozsah, ako aj prevádzkové pravidlá pre elektronické nahlasovanie vrátane úloh centier poľnohospodárskej pomoci a interakcie s internými systémami riadenia. Osobitná pozornosť sa venuje kľúčovým interpretačným otázkam (identifikácia povinných prevádzkovateľov, ročné prahové hodnoty verzus štvrťročné nahlasovanie, koordinácia s inými povinnými záznamami) a sankčnému režimu, ktorý je teraz plne funkčný. Systém je nakoniec zasadený do rámca EÚ pre spoločnú organizáciu trhu, poľnohospodársku štatistiku (vrátane SAIO) a model vykonávania SPP na roky 2023 – 2027 s porovnávacími odkazmi na iné členské štáty.

Keywords (EN)

regulated activity, economically justified costs, single till, dual till, sharing of commercial values

Kľúčové slová (SK)

Granaio Italia, register zásob obilnín, riadenie poľnohospodárskych údajov, monitorovanie trhu, Spoločná poľnohospodárska politika (SPP)

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required to capture the quantities actually stored in silos, storage centres, and along the cereal supply chain.

In this context, the Italian 2021 Budget Law⁽¹⁾ provided for the establishment, within the National Agricultural Information System (SIAN)⁽²⁾, of an electronic register of cereal production and stocks, designed to record all inflow and outflow operations concerning the main cereals, “in order to enable accurate monitoring of cereal production present on the national territory”.

The underlying rationale is twofold. On the one hand, the register is intended to provide the State and the Regions with a robust information base for planning support measures, preventing or managing market crises, and complying with European statistical obligations in the field of agricultural markets. On the other hand, it aims to increase transparency of flows along the supply chain, in a sector where the origin of raw materials (Italian, EU, or non-EU wheat) lies at the heart of the public debate and of strategies for enhancing the value of Italian cereal production and “Made in Italy” wheat-based products.

II The Regulatory Genesis: from 2020 to the Recent Implementing Decrees

From a regulatory perspective, the development of the “Granaio Italia” system has been far from linear. The first building block is represented, as mentioned, by Article 1, paragraphs 139–142, of Law No. 178/2020, which established a system for monitoring cereal production through an electronic register managed within the National Agricultural Information System (SIAN) and delegated to one or more ministerial decrees the detailed rules on the scope of the obligation, the products concerned, and the procedures and deadlines for recording data.

The first implementing decree was adopted by the Ministerial Decree of 29 March 2022⁽³⁾, published in the Official Gazette No. 121 of 25 May 2022, which formally established the “Cereal Production Register” within SIAN, described the technical

specifications of the register and laid down a number of obligations to record inflow and outflow operations, with a deadline for registration set at the twentieth day of the third month following each operation. At this stage, however, the system remained largely experimental, not least because of the repeated postponement of the entry into force of sanctions and the operational difficulties reported by operators.

The real turning point came in 2024: Article 4-bis of Decree-Law No. 63 of 15 May 2024⁽⁴⁾ completely redrafted paragraphs 139–142, recharacterising the monitoring obligation as a “quarterly declaration of stocks” and defining more precisely the personal scope (farm holdings, cooperatives, consortia, commercial undertakings and first-processing enterprises in the cereal supply chain) and material scope (list of cereals) of the obligations, with annual quantitative thresholds differentiated by product.

On this new framework builds MASAF Ministerial Decree of 1 October 2024, No. 507566, which implements the updated provisions by describing the functioning of the electronic register, the data to be communicated and the quarterly frequency of stock declarations, while the subsequent Ministerial Decree of 30 January 2025, No. 43350, amends the 2024 decree in order to correct and clarify several operational aspects, in particular regarding the starting date of the obligations and the management of registrations on the SIAN portal.

In parallel, a series of extension decrees and corrective interventions progressively postponed the point at which the system would become fully binding in practice. At present, “Granaio Italia” is mandatory for all operators in the cereal supply chain exceeding the statutory thresholds as from 1 July 2025, with the first effective reporting deadline set for 20 October 2025. This confirms a trajectory through which a single provision in a Budget Law has been transformed into a stable information infrastructure that is destined to affect the day-to-day management of cereal enterprises.

III Nature and Purposes of the System: Not Just a Reporting Obligation, But an Information Infrastructure

“Granaio Italia” has been formally designed as a reporting obligation imposed on operators in the cereal supply chain, but its deeper rationale must be read in systemic terms: it is not (only) an additional administrative requirement, but rather a component

1 Law No. 178 of 30 December 2020, Art. 1, paras. 139–142.

2 The National Agricultural Information System (Sistema Informativo Agricolo Nazionale, SIAN) is Italy’s national ICT platform for agricultural administration, operating within the institutional framework of the Ministry of Agriculture, Food Sovereignty and Forests, AGEA, and the paying agencies. It integrates administrative and technical data relating to farms, CAP support schemes, controls by paying agencies, and sectoral supply-chain registers, and constitutes the backbone of Italy’s agricultural e-government infrastructure.

3 Frascarelli and Palazzoni (2025).

4 Converted, with amendments, by Law No. 101 of 12 July 2024.

of a broader information infrastructure serving agricultural and market policies. From a technical-legal perspective, the system is embedded in SIAN, which serves as the single repository for quarterly stock declarations. For each obligated operator, the register records – in aggregated and cumulative form – the quantities of each cereal held during the reference period. These data are broken down by origin (national, EU, third countries) and by type of operation (purchases, sales, other movements). The end result is not an “inventory ledger” in the civil-law or tax sense, but a centralised database, structured so as to provide the Ministry of Agriculture, Food Sovereignty and Forests (MASAF), the Regions, and the paying agencies with an up-to-date snapshot of physical availabilities along the supply chain, with potentially very granular territorial detail.

At least three purposes are explicitly pursued. First, to comply with the obligations to collect and transmit statistical information to the European Union: EU regulations on the common organisation of agricultural markets and on agricultural statistics require Member States to supply reliable data on cereal production, trade and stocks. “Granaio Italia” is intended to provide the primary source for fulfilling these obligations, overcoming the fragmentation and limitations of traditional sample surveys.

Secondly, the system is conceived as a crisis-management tool: having near real-time information on the quantities actually present in storage centres, cooperatives, and first-processing enterprises makes it possible to calibrate support measures (extraordinary aid, market withdrawal schemes, management of logistical emergencies) more precisely, reducing the risk of “blind” decisions based solely on price trends or partial signals from the field.

Finally, the register can support policies aimed at enhancing Italian wheat and improving transparency for consumers. Although it is not a traceability instrument in the strict sense, aggregated knowledge of the flows of national, EU, and non-EU cereals provides an important information basis for the debate on the origin of raw materials used in pasta, bakery products, and other processed cereal value chains.

From this perspective, the impact of “Granaio Italia” will depend less on the individual quarterly declaration required from enterprises and much more on how the administration will be able to use – and feed back to the sector – the data collected. In a modern “data governance” perspective, the register has the potential to evolve from a mere bureaucratic burden into a tool for market governance and policy planning – and, ultimately, for strengthening the competitive capacity of the Italian cereal supply chain vis-à-vis its European and international competitors.

However, a critical assessment of Granaio Italia cannot be limited to the usefulness of the information collected. The public interest in reliable and timely cereal stock data is evident, particularly after recent market disruptions and in light of the growing role of stock notifications in EU agricultural market governance. Yet the proportionality of the mechanism depends on whether the quarterly reporting burden imposed on private operators is genuinely necessary, whether it avoids duplicating information already available through other administrative, accounting, or traceability systems, and whether the data collected are actually returned to the sector in the form of useful market intelligence.

This proportionality assessment is especially relevant for medium-sized operators. Very small farms are largely excluded by the quantitative thresholds, while large cooperatives and commercial undertakings usually possess ERP systems, specialised staff, and consolidated internal procedures.

The most exposed category may therefore be represented by farms, storage facilities and first-processing undertakings that exceed the statutory thresholds but do not yet have a fully digitalised administrative structure. For these operators, the register may operate not merely as a transparency instrument, but as an additional layer of compliance, producing a form of compliance asymmetry between differently organised actors within the same cereal supply chain.

Moreover, the integration of stock declarations within SIAN concentrates commercially relevant information in a single public digital infrastructure. This centralisation is justified by market-monitoring and food-security objectives, but it also requires safeguards against mission creep, excessive cross-use of data, and indirect disclosure of commercially sensitive information. Where stock data are linked to identifiable farms, individual undertakings or farm-dossier information, the system may also raise issues of agricultural data governance and, in appropriate cases, data protection by design, purpose limitation and lawful processing under Regulation (EU) 2016/679.

IV Agricultural Data Governance, Confidentiality Safeguards, and Compatibility with EU Data Protection Principles

The characterisation of “Granaio Italia” as an information infrastructure – rather than a mere administrative reporting obligation – makes it necessary to assess the legal regime applicable to the data collected through the register. The system

does not simply require operators to communicate isolated figures. It creates a centralised public dataset concerning cereal stocks, flows, origins, and movements within the national supply chain. These data may have statistical, regulatory, and market-monitoring value, but they may also reveal commercially sensitive information on procurement strategies, storage capacity, contractual relations, and market positioning.

For this reason, the issue should not be framed only in terms of trade secrecy. A broader agricultural data-governance perspective is required. EU law does not generally treat agricultural data as objects of ownership in the traditional civil-law sense⁽⁵⁾. The more relevant legal questions concern control, access, use, re-use, interoperability, confidentiality, and safeguards against unauthorised disclosure or secondary exploitation⁽⁶⁾. “Granaio Italia” therefore raises a structural question: to what extent may a public authority require private operators to generate and transmit market-relevant data, and under which conditions may those data be stored, combined with other administrative datasets, and used for public-interest purposes?

From the standpoint of Regulation (EU) 2016/679, a distinction must be drawn. Stock and flow data relating exclusively to companies are not, as such, personal data. However, where the information concerns individual farmers, sole proprietorships, family farms, members of small cooperatives, or holdings identifiable through the farm dossier and other SIAN databases, the processing may fall within the material scope of the GDPR. In such cases, the system must comply with the principles of lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity, and confidentiality. The legal basis is not consent, which would be structurally unsuitable in the presence of a statutory reporting obligation, but rather compliance with a legal obligation and/or the performance of a task carried out in the public interest or in the exercise of official authority.

This conclusion is reinforced by the general privacy information made available within the AGEA/SIAN framework. AGEA expressly states that personal data processed within SIAN may be used for institutional purposes connected with the management and processing of farm information, the collection and insertion of data into the National Agricultural Information System, administrative checks, on-the-spot controls, litigation, compliance with EU and national provisions, and requests from other public administrations. The same information identifies AGEA as the data controller in its capacity as the coordinating

and management body of SIAN and as the national paying agency, while CAAs and other technical entities may act as processors for certain categories of processing. This confirms that Granaio Italia does not operate in an isolated digital environment, but within a broader administrative data ecosystem in which access, communication, and further use of data must be carefully delimited.

This has two consequences. First, the public-interest purpose pursued by the register must remain sufficiently specific. Data collected for cereal-stock monitoring, market transparency and crisis management should not be freely reused for unrelated purposes without an adequate legal basis. Secondly, the architecture of the register should incorporate data protection by design and by default: only data necessary for the declared purposes should be collected; access should be role-based and traceable; aggregation should be preferred whenever individual-level information is not required; and any interconnection with other administrative databases should be justified by a clearly identified regulatory function. Where the scale of processing, the centralised nature of the database or its possible combination with farm-level information creates a high risk for identifiable natural persons, the need for a data protection impact assessment should at least be considered.

A distinct issue concerns non-personal but commercially sensitive data. Even when GDPR is not directly applicable, cereal-stock information may remain protected by rules on commercial confidentiality, statistical confidentiality, and administrative secrecy. In highly concentrated local markets, even aggregated data may enable competitors or other market actors to infer the position of individual operators. The legal design of “Granaio Italia” should therefore include clear rules on who may access raw data, for which institutional purposes, under which security measures, and with what limits on publication, sharing or re-use. The legitimacy of public access to commercial data depends not only on the existence of a statutory reporting obligation, but also on the proportionality and transparency of the subsequent use of the information collected.

The point is particularly relevant because, within the general AGEA/SIAN framework, personal data may be communicated to a wide range of public bodies for institutional purposes, including tax authorities, paying agencies, supervisory bodies, regional and local authorities, EU institutions, and judicial or public-security authorities. This does not make such communication unlawful per se. However, it reinforces the need for a clear functional separation between the original purpose of cereal-stock monitoring and any further use of the data for administrative, fiscal,

5 Berisha, Mooney, Pourzolfaghar and Helfert (2026).

6 van der Burg, Wiseman and Krkeljas (2021).

inspection, or enforcement purposes. The legal issue is therefore not whether public authorities may ever access the data, but whether the purposes, access rights, retention periods, and safeguards are sufficiently specific and transparent in relation to the particular sensitivity of cereal-stock information.

This aspect connects “Granaio Italia” with the broader EU data-governance framework. Regulation (EU) 2022/868 on European data governance and Regulation (EU) 2023/2854 on harmonised rules on fair access to and use of data confirm that the European legal order increasingly favours data sharing and data re-use, but within controlled frameworks that protect personal data, confidentiality, and legitimate economic interests. The Data Governance Act is relevant in particular because it addresses the re-use of certain categories of protected data held by public sector bodies, including data protected on grounds of commercial confidentiality. The Data Act, in turn, provides a horizontal framework for fair access to and use of data and includes rules on the making available of data to public sector bodies in specific circumstances. “Granaio Italia” should be read in this direction: not as an unlimited public appropriation of agricultural data, but as a sector-specific mechanism for producing reliable market intelligence under legally defined safeguards⁽⁷⁾.

Accordingly, the credibility of the register will depend on a balance between public informational needs and private data interests. Operators may accept the burden of transmitting sensitive stock information if they can verify that the data are used for clearly defined public purposes, protected against undue disclosure, and returned to the sector in the form of aggregated analyses useful for market governance. Without such guarantees, the register risks being perceived as a one-way extraction of commercially valuable information from the cereal supply chain.

V Obligated and Exempted Operators

The personal scope of “Granaio Italia” is currently defined by the combined provisions of Article 1, paragraphs 139–142, of Law No. 178/2020 (as redrafted by Article 4-bis of Decree-Law No. 63/2024, converted into Law No. 101/2024), and by MASAF Ministerial Decree of 1 October 2024, No. 507566, as amended by Ministerial Decree of 30 January 2025, No. 43350. As a first step, the primary legislation identifies as addressees of the quarterly stock declaration obligation

farm holdings, cooperatives, consortia, commercial undertakings, and first-processing enterprises in the cereal supply chain. These operators fall within the system only where the relevant product-specific thresholds are exceeded; the structure, values, and temporal logic of those thresholds are examined in Section VI below.

Against this background, the legislator’s lexical choice to refer to operators that “acquire and sell” (using the conjunction “and”) cereals immediately raised practical questions. A strictly literal reading might suggest that operators performing only one of the two functions (for example, those who merely purchase cereals on behalf of third parties, or, conversely, those who only carry out sales operations without a genuine phase of “acquisition” into their own assets or physical availability) fall outside the scope of the obligation.

However, administrative practice and the first technical indications published on the SIAN portal and in communications by industry associations¹ tend to use the wording “acquire or transfer” or, more generally, “acquire or sell”, which points to an interpretative approach aimed at including within the scope of application all actors who generate significant inflows or outflows of cereals, regardless of whether they actually perform both functions.

From a systemic point of view, such an extensive reading appears more consistent with the rationale of stock monitoring. If the objective is to represent the volumes physically held or moved along the supply chain, it would be difficult to justify excluding from the database operators who, although engaged in only one side of the transaction, contribute significantly to the formation of the overall availability of the product. The operational consequence is that a farm holding, cooperative or commercial undertaking exceeding the quantitative thresholds even solely in its capacity as “purchaser” (for instance, a large cooperative receiving members’ deliveries) or solely as “seller” (such as a trader handling consignments on behalf of third parties) should prudently be regarded as obligated to keep the electronic register and to submit quarterly stock declarations, pending any official clarification confirming or rejecting the extensive interpretation that has emerged in practice.

Alongside this core group of operators, the legislator and the implementing decree establish a set of exemptions which, far from being marginal, profoundly affect the pool of operators actually concerned by the system. First, holdings whose main activity is livestock production and undertakings producing animal feed are exempted, since cereals represent for them a raw material mainly intended for on-farm use in animal husbandry or for transformation into feed sectors already subject to stringent traceability

⁷ Ryan, Atik, Rijswijk, Bogaardt, Maes and Deroo (2024); Nunziante (2025); COPA-COGECA (2018).

and control requirements⁸). Moreover, operations relating to the processing of cereals and to processed cereal products (flour, semolina, pasta, bakery products) are excluded, as the register is designed to intervene upstream in the chain, at the level of cereals as raw grain, and not at the level of derived products.

In addition, cereals destined for on-farm reuse (for example, farm-saved seed or grain used to feed the holding's own livestock) do not have to be declared, nor do cereals held by seed operators for sowing purposes, i.e. in segments where the interest in stock monitoring is secondary to the specific objectives of the production chain concerned.

Another exemption of great practical importance concerns products that, at harvest time, are transferred to private or associative storage structures (cooperative silos, consortial collection centres, collective warehouses). In such cases, the obligation to record stocks does not fall on the individual farmer making the delivery – who is thus relieved from an additional administrative burden – but on the operator managing the storage facility, which must include in its own stock data the quantities received from the various contributors.

The resulting framework is one in which the “centre of gravity” of the obligation tends, at least for a significant part of the sector, to shift away from small and medium-sized individual farms towards collective structures and larger commercial undertakings, which are called upon to ensure the proper functioning of the “Granaio Italia” infrastructure, including through adequate administrative arrangements and information systems. The operational and contractual implications of this shift for collective storage structures and their members are examined in Section X; the interpretative issues arising from borderline operator categories – mixed holdings, contractors, and commission agents – are addressed in Section IX.

VI Scope of the Obligation and Quantitative Thresholds

The material scope of the reporting obligation connected with “Granaio Italia” is defined, at regulatory level, by Article 2 of MASAF Ministerial Decree of 1 October 2024, No. 507566, which precisely identifies the products subject to registration. These are exclusively cereals in grain form, grouped into a closed list of product categories, namely: durum wheat; common wheat

and triticale (considered jointly for the purposes of the register); maize; barley; spelt; rye; sorghum; oats; millet; and canary seed.

Whenever these products are held “on any legal basis” on Italian territory by an operator in the cereal supply chain, they constitute the material basis for entries of “inflows” (introductions into the holding as a result of production, purchase or other transfers) and “outflows” (sales, transfers, processing, removals), which must be recorded in aggregated and cumulative form in the Granaio Italia module of SIAN, with quantities broken down by origin (national, EU or third countries).

The decree, therefore, does not establish a generic “inventory register”, but a thematic register focused on stocks and flows of the listed cereals in their state as primary products, in order to provide a homogeneous and comparable statistical base, consistent with the product classifications used in EU legislation on markets and agricultural statistics. Within this material perimeter, however, the obligation to record data is not generalised. Article 4(2) of the same decree provides that operators are required to record, by the twentieth day of the month following the end of the reference quarter, only those inflow and outflow operations which, in the previous quarter, concerned a quantity of an individual product exceeding minimum thresholds defined as “annual” and differentiated for each cereal. More specifically, the rule sets an annual threshold of 30 tonnes for durum wheat, 40 tonnes for common wheat, 80 tonnes for maize, 40 tonnes for barley, 60 tonnes for sorghum, 30 tonnes for oats, and, finally, a cumulative annual threshold of 30 tonnes for spelt, rye, millet, triticale, and canary seed.

The legislative wording is peculiar, as it combines quarterly monitoring of operations (the entries always refer to what happened in the “previous quarter”) with thresholds expressed in terms of annual quantities. This generates an apparent mismatch between the time horizon of the threshold and that of the reporting obligation. In substance, the legislator uses the annual threshold as a structural indicator of the operator's size (and of the relevance of its flows for market monitoring), but requires operators to check, quarter by quarter, whether the movements already made, or reasonably foreseeable during the calendar year, place the individual product above the reference limit.

Interpretative practice, as emerges from circulars issued by professional organisations⁹ and from

8 See Regulation (EC) No 178/2002, Art. 18, on the traceability of food, feed, food-producing animals and substances intended to be incorporated into food or feed; Regulation (EC) No 183/2005 on feed hygiene;

9 Confagricoltura Veneto (2025); Confagricoltura Friuli Venezia Giulia (2025); Confagricoltura Mantova (2024); Confagricoltura Torino (n.d.).

technical notes published on the SIAN portal¹⁰, tends to read the thresholds as “minimum quantities per calendar year”, once exceeded, giving rise, for that product, to a systematic obligation to register in all quarters in which relevant operations occur. The practical consequences of this interpretative approach for operators whose annual volumes oscillate around the statutory limits are examined in Section IX.

VII Operational Arrangements for Keeping the Electronic Register

From an operational standpoint, “Granaio Italia” takes the form of an exclusively electronic register, hosted within SIAN and accessible to operators either directly (with their own credentials) or through agricultural assistance centres (Centri di Assistenza Agricola, CAA) or other authorised intermediaries. The system can be fed either by manually entering information via the web application or through data interchange flows generated by company or cooperative management software, in accordance with the technical standards made available by AGEA (the Italian agency managing agricultural payments).

The obligation, therefore, does not require any prior stamping of books, nor the keeping of a paper register: no periodic printout is required either, and the electronic “cereal register” module is the sole legally relevant repository for recording stocks and movements, with quantities always expressed in tonnes, which constitute the system’s reference unit of measurement.

Once the conditions described in Sections V and VI are met, the operator is required to use the SIAN module according to a deferred and cumulative reporting logic. Individual inflows and outflows are not recorded on a day-by-day basis. Instead, by the twentieth day of the month following the end of each quarter, the operator submits a summary statement of the total quantities of each product purchased and sold during the reference period, broken down by origin (national, EU, third countries) and by type of operation¹¹.

10 For the practical implementation of the system, see SIAN – Sistema Informativo Agricolo Nazionale. 2025. FAQ – Registro dei cereali, version of 30 September 2025; SIAN – Sistema Informativo Agricolo Nazionale. 2025. Registro Cereali – Manuale utente qualificato, version 2.0. Both documents are available on the SIAN portal, “Registro dei cereali” section, <https://www.sian.it> (accessed 26 May 2026).

11 According to the SIAN technical documentation, at first access the operator is required to record the initial stocks, so that subsequent outflow movements can be registered consistently. Quantities are expressed in tonnes, with up to two decimal places.

As a result, from a management perspective the real organisational effort does not lie so much in “writing” into the SIAN register, but in setting up within the holding (or cooperative, or commercial undertaking) internal procedures and IT tools that make it possible to reliably reconstruct, at the end of each quarter, the aggregated data to be uploaded into the system. In practice, the electronic register lives off what emerges from the accompanying documents for goods (contracts, transport documents – documenti di trasporto, Ddt – invoices, delivery notes, warehouse receipts) and from warehouse management systems. A coherent product master data set, a unique coding system for consignments and an orderly linkage with VAT accounting thus become essential conditions for complying with the quarterly obligation without strain.

Although recourse to CAAs is not mandatory, it is often advisable, since it allows the telematic transmission phase to be entrusted to an intermediary already familiar with the farm dossier and SIAN procedures, and facilitates the integration of Granaio Italia into the broader flow of digital agricultural services.

However, the legal responsibility for the accuracy and completeness of the declared data always remains with the obligated operator. Delegating to a CAA does not diminish the operator’s duty to place the intermediary in a position to operate correctly, by providing, in due time, information on quarterly movements and by checking, before submission, that draft declarations are consistent with the holding’s own records.

From this perspective, the electronic register should not be perceived as an “external IT object”, but rather as the final point of an internal process of collection, checking, and consolidation of stock data. Only in this way can the new, undeniably burdensome obligation be turned into an opportunity to streamline document management along the cereal supply chain, reducing overlaps and redundancies with other accounting and traceability requirements.

VIII Sanctioning Regime

The sanctioning regime of “Granaio Italia” has undergone a long and layered gestation, which deserves to be reconstructed, as it directly affects how enterprises perceive the obligation¹².

In the original version of Article 1(142) of Law No. 178 of 30 December 2020, the legislator had provided for a rather severe system, combining administrative fines with potential measures directly impacting business activity, in a context still lacking a clear operational definition of the register.

12 Bertolini Tosoni (2025).

The subsequent redrafting of paragraphs 139-142 by Article 4-bis of Decree-Law No. 63 of 15 May 2024, converted into Law No. 101 of 12 July 2024, brought the system back within more straightforward boundaries, removing the most afflictive elements and maintaining an essentially administrative framework. As from 31 July 2025, failure to comply with the obligations to record cereal stocks (failure to establish the electronic register, omission or late submission of quarterly declarations, or the provision of incomplete or untrue data) is punishable by an administrative fine structured in two bands: from EUR 500 to EUR 2,000 for those who fail to make the communication within the prescribed deadlines and in the prescribed manner, and from EUR 2,000 to EUR 4,000 for those who do not comply with the technical rules on communication and electronic keeping of the register. The fine is to be calibrated in light of the seriousness of the infringement, any recurrence and the quantity of product not declared⁽¹³⁾.

In parallel, the legislator has repeatedly intervened on the starting date of the sanctioning regime: initially through a series of year-by-year extensions included in the so-called Milleproroghe decrees, which postponed the effective applicability of sanctions; and, most recently, through an amendment introduced during conversion of Decree-Law No. 202 of 27 December 2024, which shifted to 31 July 2025 the end of the “protected” period, during which the monitoring system could be launched and tested without sanctioning consequences for operators.

It follows that, for operators exceeding the statutory thresholds, the obligation to keep the electronic register and to submit quarterly declarations is now fully in force, and infringements relating to quarters after 31 July 2025 are subject to sanction, while any irregularities committed in the preceding phase remain outside the scope of the sanctioning apparatus. From that date onwards, the competent control bodies – AGEA, ICQRF, the Regions and the Guardia di Finanza (Italian Financial Police), each within its sphere of competence – may therefore contest the irregularities detected.

In practical terms, the combined effect of (i) the start of the obligations, (ii) the quarterly frequency of declarations (with the first “full” deadline falling on 20 October 2025 for the July–September quarter) and (iii) the commencement of the sanctioning regime means that 2025 amounts to a real “stress test” year for the system. Enterprises are required to equip themselves from the outset, knowing that initial misalignments may not be immediately exploited in a punitive way, but will

nevertheless constitute an indicator of the reliability of the data they provide.

Looking ahead, the main critical issue is not so much the nominal amount of the fine – which is relatively limited in relation to the average economic size of the cereal enterprises concerned – but rather the risk of multiple infringements accumulating (several quarters, several products, several group entities) and, above all, the possible interaction with other inspection areas (tax, social security, HACCP, feed and food law). Hence the need for operators to regard compliance with Granaio Italia obligations not merely as a “cost of non-compliance” to be factored into their budget, but as an integral component of their overall reliability in the eyes of the administration and of their supply-chain partners.

IX Interpretative Issues and Practical Challenges

Although the regulatory framework of “Granaio Italia” is objectively structured, it raises a number of interpretative questions and not a few practical challenges, which shape how operators perceive the obligation and, in the longer term, the system’s actual capacity to function as an instrument of market governance.

A first issue concerns, as discussed in Section V, the personal scope of application. The legislative wording referring to operators who “acquire and sell, on any legal basis, national and foreign cereals” is susceptible to both a restrictive and a functional reading, with administrative practice tending towards the latter.

This uncertainty is compounded by several borderline cases: delivery cooperatives which, in practice, do not “purchase” from their members but receive product under complex internal regulations; contractors who move cereals without acquiring title; logistics companies that manage silos and storage platforms on behalf of third parties; and “mixed” holdings where livestock production is formally predominant but the volume of cereals produced or traded systematically exceeds the thresholds.

The absence of precise definitions of “prevalence” for the purposes of “Granaio Italia”, and of clear criteria for qualifying “acquisition” in the presence of atypical contractual arrangements (deposit, consignment, sale on commission, *contratti estimatori*), creates a risk of territorially uneven application. Disputes may arise as to whether a given operator is subject to the obligation, particularly where sanctions are imposed on operators who reasonably believed themselves to be excluded. This uncertainty also affects legal certainty and

13 Law No. 178 of 30 December 2020, Art. 1, para. 142, as amended by Art. 4-bis of Decree-Law No. 63 of 15 May 2024, converted, with amendments, by Law No. 101 of 12 July 2024.

legitimate expectations: operators located in comparable economic positions may be treated differently depending on how local authorities, CAAs, or storage structures interpret the same statutory wording.

No less problematic is the material and quantitative dimension of the obligation. The structural tension between annual product thresholds and quarterly reporting – analysed in Section VI and implemented operationally through the SIAN module described in Section VII – translates into a concrete dilemma for operators whose annual volumes oscillate around the statutory limits.

On the one hand, operators that systematically handle volumes above the thresholds have no alternative but to put in place continuous procedures for collecting and aggregating data. On the other hand, for holdings that oscillate around the annual limit, the practical question is whether to activate the obligation already on a precautionary basis (with the risk of incurring an “excess” administrative burden) or to wait and verify *ex post* whether the threshold has been exceeded, with the possible need to reconstruct several quarters of movements retrospectively. This generates a potential mismatch between the objective of “near real-time” monitoring and the reality of a system that, for this category of operators, tends to operate in a corrective, *ex post* logic. On this point too, practice – as emerges from the first experiences reported by CAAs and storage facilities – shows solutions that are not always uniform, with the risk of differentiated treatment across territories and supply chains.

This problem is not merely technical. Uniform national thresholds may generate unequal practical effects depending on the organisational capacity of the operator concerned. A large cooperative or first-processing undertaking can usually internalise the cost of quarterly reporting through existing management systems. A medium-sized farm, trader, or storage operator close to the threshold, by contrast, may face substantially higher marginal compliance costs. The legal issue is therefore not formal discrimination, but the proportionality of a uniform reporting model when applied to operators with markedly different administrative and digital capacities.

A further issue concerns consistency between the data recorded in the electronic register and that recorded in other mandatory records (VAT accounting, stock registers, HACCP systems, feed traceability). The legislator does not establish any formal hierarchy between these records, but, in the context of controls, the administration will naturally cross-check the different databases. Any discrepancies – even when arising from different aggregation criteria or rounding practices – may be read as indicators of overall unreliability, with consequences extending beyond

the narrow perimeter of Granaio Italia. This reinforces the need for clear criteria on data reconciliation, since a register conceived for market-monitoring purposes should not indirectly become a source of uncertainty in tax, food-safety, or traceability controls merely because different systems classify or aggregate the same movements in different ways.

Another sensitive aspect is the protection of trade secrets. While the legislation does, in principle, ensure that data are processed confidentially and only disclosed in aggregated form, in highly concentrated local markets – where only a few large operators are active per geographic area – aggregated data may nonetheless allow third parties to infer the procurement and sales strategies of individual operators. This risk of competitive exposure generates concrete resistance to the obligation among operators who regard the quarterly declaration as an involuntary disclosure of commercially sensitive information. The broader data-governance framework has been examined in Section IV. At this stage, the practical point is that even formally aggregated data, when combined with other administrative datasets, may in certain territorial or sectoral contexts allow commercially sensitive information to be inferred. The protection of trade secrets, therefore, depends not only on formal aggregation but also on access governance, disclosure thresholds, and safeguards against indirect identifiability in concentrated local markets.

Finally, the indirect administrative burden on CAAs and collective storage structures should not be underestimated. These actors are called upon to act as an interface between the legal framework and business practice. A purely delegating use of their services (register “managed by the CAA” without adequate internal awareness of the data transmitted) risks undermining the quality of the information fed into the system and shifting potential conflicts, in the event of disputes, from the enterprise-administration relationship to the enterprise-intermediary relationship.

Taken together, these elements confirm that the robustness and effectiveness of Granaio Italia will depend less on further tightening of the rules than on the administration’s capacity to provide clear and stable interpretative guidance and to build a technical dialogue with operators. The decisive issue is not only operational, but also legal: an obligation based on uncertain personal scope, the annual-threshold mechanism, and cross-checking with heterogeneous records risks generating uneven enforcement and disproportionate compliance costs. Only in this way can an obligation initially perceived as “new bureaucracy” be transformed into a shared tool for understanding and managing the cereal supply chain. If this guidance is not provided, the register may produce a paradoxical effect:

improving public market intelligence while increasing private administrative vulnerability, especially for medium-sized operators that are large enough to fall within the system but not sufficiently structured to absorb its compliance costs without friction.

X Operational Impacts on Farm and Business Management

Building on the operational framework described in Section VII, “Granaio Italia” is, from the enterprises’ perspective, far more than the quarterly insertion of a few figures into the SIAN portal: it entails, to a greater or lesser extent depending on the case, a reorganisation of administrative structures and internal information flows¹⁴.

For a “pure” arable farm falling within the scope of the register, the main effect is the need to permanently align three levels: commercial documents (contracts, transport documents – documenti di trasporto, Ddt – invoices, weighing slips), the warehouse management system or, in simpler contexts, internal in/out registers, and the quarterly SIAN declaration, which must become the coherent and verified synthesis of the upstream data. This often requires rationalising codes and master data (correctly distinguishing, for example, durum wheat/common wheat/maize/barley in internal records), setting a quarterly “cut-off date” for checking physical stocks, and defining clear procedures as to who collects data, who checks them, and who authorises their transmission to the CAA or direct input into the system.

In mixed holdings with predominant livestock activity, which are formally exempt but often involved in non-negligible cereal flows – a borderline category discussed in Section IX – the impact is more nuanced. It is necessary to avoid a situation in which the absence of a “Granaio Italia” obligation translates into poor management of cereals destined for on-farm use or internal feed production, with possible repercussions in other areas (HACCP, feed controls, relationships with suppliers).

For cooperatives and collective storage structures, the electronic register emphasises a role that is already central but sometimes poorly formalised. As they become the “collection point” for data on members’ stocks, these entities must equip themselves with information systems capable of tracking, for each lot, inflows, outflows, destinations, and balances, and of providing members with detailed reports enabling

them, in turn, to maintain consistency between what is recorded in Granaio Italia and what is reported for tax and accounting purposes.

This often implies revising internal regulations and delivery or storage contracts in order to clarify who is responsible for the registration obligations, with what liabilities, and on the basis of which information provided by members. For commercial undertakings and first-processing enterprises – which typically manage high volumes and diverse relationships with producers, intermediaries, and industrial customers – the primary operational challenge lies in integrating the cereal register with the company’s ERP systems to avoid double data entry and reduce the risk of errors; the risks arising from cross-checks between SIAN data and other administrative databases are examined in Section IX.

In this scenario, dialogue with CAAs and advisers (accountants, supply-chain technicians) becomes part of the “ordinary maintenance” of the system: defining in advance who does what, within which timelines, and scheduling at least one internal review per year of the consistency between the electronic register, actual stocks and warehouse accounting is likely the most effective way to reduce sanctioning risk and, at the same time, to turn the obligation into a management control tool.

Ultimately, the true impact of “Granaio Italia” on business management is not measured by the time needed to fill in the quarterly declaration. It is measured by the enterprise’s ability to establish a clear, documented, and verifiable “internal discipline for cereals” – one capable of withstanding, without undue strain, a documentary or on-site inspection that starts precisely from the database of the new register.

XI Link with EU Law and Market Policy

“Granaio Italia” is not an isolated national device, but lies at the intersection between the EU rules on the Common Market Organisation (CMO), Union-level market data notification obligations and the new CAP 2023–2027 architecture.

On the market side, the basic reference is Regulation (EU) No 1308/2013 establishing a common organisation of the markets in agricultural products, which entrusts the European Commission – also for cereals – with monitoring prices, production, trade and stocks, with a view to possibly activating public intervention, private storage aid or exceptional crisis-management measures.

In this perspective, the need for timely and reliable information on cereal stock levels has become increasingly central, as illustrated by Commission

¹⁴ Del Bene (2025); on the regulatory challenges raised by precision farming and digital agricultural technologies in EU agriculture, see Szira, Gregus-Greutter, Zoltán Greutter and Varga (2024).

Implementing Regulation (EU) 2022/791, which amended Implementing Regulation (EU) 2017/1185 specifically “as regards the notification of levels of stocks of cereals, oilseeds and rice”. In the recitals, the Commission explicitly refers to the Russian invasion of Ukraine and to tensions on world cereals markets to justify the need for “up-to-date information on stock levels held by producers, wholesalers and other relevant operators”.

Against this background, the “Granaio Italia” system can be seen as the national tool that enables the Italian administration to reconstruct stock volumes held by the main operators along the cereal supply chain, on the basis of the reporting mechanism described above. It thus provides a structured database for meeting Italy’s notification obligations towards the Commission and for feeding the information flows underpinning the EU cereals market observatory⁽¹⁵⁾ and related dashboards, which periodically publish data on production, trade, prices and – increasingly – stocks.

From a more strictly “statistical-institutional” viewpoint, the decision to set up an electronic register of stock levels forms part of the broader process of rationalising European agricultural statistics initiated by Regulation (EU) 2018/1091 on integrated farm statistics, which replaced the previous fragmented framework and paved the way for progressive integration of different statistical domains.

This process has been further developed through Regulation (EU) 2022/2379 on statistics on agricultural input and output (the so-called SAIO Regulation⁽¹⁶⁾), which consolidates and harmonises EU data collections on agricultural production, stocks and market flows.

At the same time, this “hunger for data” is driven by the new logic of the post-2023 CAP. Regulation (EU) 2021/2115⁽¹⁷⁾ on CAP Strategic Plans and Regulation

(EU) 2021/2116⁽¹⁸⁾ on the financing, management and monitoring of the CAP establish a performance-based delivery model, under which Member States must demonstrate, through common output, result, impact and context indicators, the actual contribution of interventions to the objectives pursued by the CAP⁽¹⁹⁾. In this framework, “Granaio Italia” does not create a new CAP indicator and does not automatically feed the indicators listed in Annex I to Regulation (EU) 2021/2115. Its function is more specific and, at the same time, more strategic: it provides an evidentiary layer capable of improving the interpretation of those indicators in the cereal sector.

First, stock data can improve the assessment of market stability and income resilience. Price movements alone do not always reveal whether a market disturbance is caused by physical scarcity, concentration of stocks, import dependence, logistical bottlenecks, or speculative behaviour. By providing product-specific and origin-based information on the quantities actually held along the national cereal supply chain, “Granaio Italia” may help the administration to correlate price volatility, physical availability, and income pressure. This is particularly relevant when assessing whether sectoral support measures, coupled with support for strategic crops or risk-management instruments included in the Italian CAP Strategic Plan, produce measurable effects beyond the mere formal expenditure of funds.

Secondly, “Granaio Italia” may support crisis-management mechanisms. The agricultural reserve established by Article 16 of Regulation (EU) 2021/2116 and the exceptional market measures available under Articles 219–222 of Regulation (EU) No 1308/2013 require public authorities to assess whether a market disturbance or a threat to supply justifies intervention. In the cereal sector, this assessment cannot rely exclusively on price trends. Reliable stock data may show whether a price increase corresponds to a genuine reduction in available quantities, whether stocks are concentrated in specific segments of the chain, or whether domestic availability remains sufficient despite tensions on international markets. The amendment introduced by Implementing Regulation (EU) 2022/791 to the EU notification framework confirms precisely this need for up-to-date information on stock levels of cereals, oilseeds, and rice.

15 Commission Implementing Regulation (EU) 2017/1185 of 20 April 2017, as amended by Commission Implementing Regulation (EU) 2022/791 of 19 May 2022 as regards the notification of levels of stocks of cereals, oilseeds and rice. For public market data, see European Commission, DG AGRI, Cereals Market Observatory and related cereals dashboard, https://agriculture.ec.europa.eu/data-and-analysis/markets/overviews/market-observatories/crops/cereals_en (accessed 26 May 2026).

16 Regulation (EU) 2022/2379 of the European Parliament and of the Council of 23 November 2022 on statistics on agricultural input and output, OJ L 315, 7.12.2022, pp. 1–29. See also Eurostat, Legislation – Agriculture. Statistics on Agricultural Input and Output (SAIO), <https://ec.europa.eu/eurostat/web/agriculture/legislation> (accessed 26 May 2026).

17 Regulation (EU) 2021/2115 of the European Parliament and of the Council of 2 December 2021 establishing rules on support for CAP Strategic Plans, OJ L 435, 6.12.2021, pp. 1–186.

18 Regulation (EU) 2021/2116 of the European Parliament and of the Council of 2 December 2021 on the financing, management and monitoring of the common agricultural policy, OJ L 435, 6.12.2021, pp. 187–261.

19 Cagliero, Vassallo, Pierangeli, Pupo D’Andrea, Monteleone, Camaione and Tarangioli (2023).

Thirdly, the register contributes to food-security governance. The Commission's contingency plan for ensuring food supply and food security emphasises the need for preparedness, coordination, and timely information in situations of crisis⁽²⁰⁾. Cereal stocks are a strategic variable in this respect: they indicate whether the national supply chain can absorb external shocks, whether dependence on EU or third-country cereals is increasing, and whether domestic production is able to support the needs of processors and consumers. "Granaio Italia" therefore strengthens Italy's capacity to participate in coordinated EU responses to supply disruptions, not merely by transmitting aggregate figures, but by grounding national positions in verified data on physical availability.

Fourthly, the register may contribute to the evaluation and revision of the CAP Strategic Plan. Article 134 of Regulation (EU) 2021/2115 requires Member States to report annually on performance, while the broader monitoring and evaluation framework of the CAP is designed to assess whether interventions deliver measurable results. In this context, stock data may help verify whether national measures for the cereal sector have affected production, storage patterns, dependence on imports, or the capacity of the supply chain to respond to market shocks. The point is not that "Granaio Italia" replaces CAP indicators or Eurostat statistics, but that it can make their interpretation more robust by adding a layer of sector-specific, territorially grounded, and temporally closer information.

Accordingly, a robust national information base on cereal stocks is not merely an aid to crisis management. It becomes part of the informational infrastructure through which Italy can substantiate, evaluate, and, where necessary, revise policy choices concerning the cereal sector within its CAP Strategic Plan. In this sense, "Granaio Italia" contributes to the evolution from a compliance-based model of agricultural administration – focused mainly on verifying whether beneficiaries complied with formal eligibility and reporting obligations – to a data-driven model of CAP governance, in which administrative data are used to anticipate market tensions, calibrate public intervention, and evaluate policy outcomes⁽²¹⁾.

In other words, "Granaio Italia" is the concrete interface between the day-to-day record-keeping of enterprises and macro-level EU decision-making on cereals and food security. The higher the quality

and timeliness of the data transmitted, the greater the system's potential to support evidence-based market governance, crisis assessment, and the evaluation of national policy choices within the CAP framework.

XII Comparative Insights: National Stock-Monitoring Tools in Selected EU Member States

A comparative analysis of national cereal stock-monitoring systems cannot be conducted productively without first identifying the legal variables against which each national framework is to be assessed. For the purposes of this section, the comparison is structured around six criteria:

1. the legal basis of the obligation;
2. the categories of operators subject to the reporting requirement;
3. the frequency of reporting;
4. the enforcement or sanctioning framework;
5. the technological platform or administrative channel through which declarations are submitted;
6. the degree of integration with the EU notification obligations established by Implementing Regulation (EU) 2017/1185, as amended by Implementing Regulation (EU) 2022/791.

These criteria are relevant because they correspond to the main choices left to Member States when translating EU market information needs into domestic legal and administrative instruments.

France, Spain, and Romania have been selected because they represent three different regulatory models. France illustrates a collector-centred model based on pre-existing professional accounting obligations; Spain represents an operator-targeted model built around a dedicated electronic platform directly linked to stock-notification duties; Romania provides an example of a broader food-security model covering several agricultural and food products. Italy's "Granaio Italia" system can therefore be situated within this comparative landscape as a threshold-based, register-centred model integrated into the National Agricultural Information System.

France offers a first, instructive example. Under the French Code rural et de la pêche maritime, cereal collectors are required to keep a "comptabilité matières" that records stocks and movements of cereals and to transmit regular statistical declarations on flows, stocks, and main uses of the grains to FranceAgriMer (Articles D.666-6 and D.666-7). These data are used to establish reliable cereal balances for the purpose of market monitoring by national and EU authorities, and non-compliance may lead to severe administrative

20 European Commission, Communication from the Commission, Contingency plan for ensuring food supply and food security in times of crisis, COM (2021) 689 final, 12 November 2021.

21 Cagliero, Legnini and Licciardo (2021); Ehlers, Huber and Finger (2021).

Table 1 Summarises the main comparative features of the four systems

System	Legal basis	Operators and frequency	Enforcement	Institutional model
Italy – Granaio Italia	law No. 178/2020, Art. 1(139–142), as amended; MASAF Decrees 2024–2025	farms, cooperatives, consortia, commercial and first-processing undertakings exceeding product-specific annual thresholds; quarterly reporting	administrative fines: EUR 500–2,000 and EUR 2,000–4,000	SIAN-based register integrated into the national agricultural information system
France – comptabilité matières	code rural et de la pêche maritime, arts. D.666-6, D.666-7, D.666-9	professional cereal collectors; regular statistical declarations	suspension or prohibition of cereal collection activities	a collector-centred model based on professional stock accounting and FranceAgriMer statistical flows
Spain – SIEGA	resolution of 27 September 2022; Royal Decree No. 428/2022; Implementing Regulation (EU) 2022/791	relevant operators in cereals, oilseeds and rice; monthly reporting	enforcement under the applicable national administrative framework	dedicated national IT platform for stock declarations
Romania – SERSPAR	law No. 105/2023 and implementing norms	agricultural producers, storage operators, processors, and traders; monthly reporting	administrative enforcement under national law	a broad food-security platform covering several agri-food products

Source: Author's elaboration based on Italian, French, Spanish, and Romanian legal sources and on Commission Implementing Regulation (EU) 2017/1185, as amended by Commission Implementing Regulation (EU) 2022/791

consequences, including the suspension or prohibition of cereal collection activities (Article D.666-9). Yet, there is no single, farm-level electronic register for cereals comparable, in its scope and integration into the agricultural information system, to “Granaio Italia”: the focus is placed instead on professional collectors and their responsibility to maintain accurate stock accounts. The French model is therefore centralised at the level of professional intermediation rather than at the level of a general agricultural data infrastructure.

Spain has chosen another route, closer in spirit to the Italian approach but still structurally different. Following the adoption of Implementing Regulation (EU) 2022/791, Spain adopted a Resolution of the Dirección General de Producciones y Mercados Agrarios in 2022, which identifies “relevant operators” in the cereals, oilseeds and rice sectors and obliges them to report their stock levels electronically through the Sistema de Información de Existencias para la Garantía Alimentaria (SIEGA⁽²²⁾). The obligation applies monthly, on the basis of technical thresholds and operator categories (such as cooperatives, inland and port storage facilities, millers and processors), and is implemented via a dedicated national IT platform linked to existing sectoral legislation. Here

again, the emphasis is on targeted operators and on periodic notifications of stocks, rather than on a universal register covering all farms above a uniform physical threshold. Compared with “Granaio Italia”, the Spanish model is more frequent in temporal terms, since it is based on monthly declarations, but narrower in its institutional logic, as it focuses on categories of operators identified as relevant for the purposes of stock communication.

Beyond the cereals sector in a strict sense, other Member States have recently adopted broader stock-declaration schemes for agricultural and food products, often driven by concerns about food security and price volatility. Romania, for instance, has introduced a monthly obligation for agricultural producers, storage operators, processors, and traders to declare their stocks of a wide range of agricultural and food products – including cereals and cereal-based products – via a dedicated electronic platform (SERSPAR⁽²³⁾), under Law No. 105/2023 and its methodological norms. While more extensive in sectoral coverage than Granaio Italia, this system is also conceived as a statistical and market-

22 SIEGA (Sistema de Información de Existencias para la Garantía Alimentaria) is the Spanish electronic platform for monthly stock declarations by relevant operators in the cereals, rice, oilseeds and certified seeds sectors. The data are transmitted to the European Commission in aggregated and anonymised form. See Resolución de 27 de septiembre de 2022 de la Dirección General de Producciones y Mercados Agrarios; Royal Decree No. 428/2022; Commission Implementing Regulation (EU) 2022/791.

23 SERSPAR (Sistemul Electronic de Raportare a Stocurilor de Produse Agroalimentare din România) is the Romanian electronic system for reporting stocks of agricultural and food products under Law No. 105/2023. It is made available to agri-food operators by the Ministry of Agriculture and Rural Development and developed and maintained by AFIR; statistical stock data are reported monthly. See SERSPAR, <https://stocuri.madr.ro> (accessed 26 May 2026); AFIR, The electronic system for reporting stocks of agro-food products Romania – SERSPAR is operational, 2023, <https://www.afir.ro/en/latest-news/the-electronic-system-for-reporting-stocks-of-agro-food-products-romania-serspar-is-operational/> (accessed 26 May 2026).

monitoring tool, with administrative fines for non-compliance. The Romanian model is therefore broader in product scope, but less specifically constructed around the cereal-sector architecture of the CMO; it reflects a food-security rationale that extends beyond the narrower question of cereal stock notifications.

The comparison reveals significant institutional diversity. France relies on a professional collector-based model, in which the obligation is concentrated on operators already subject to material stock-accounting duties. Spain has moved towards a targeted monthly reporting system for “relevant operators”, implemented through a dedicated national IT platform. Romania has adopted a broader monthly reporting mechanism covering several agri-food products, reflecting a food-security-driven approach. Italy, by contrast, stands out for the integration of the register into SIAN, for the use of product-specific annual thresholds to identify obligated operators, and for the decision to build a stable register-based infrastructure within the general digital administration of agriculture.

This diversity has important implications for EU harmonisation. Implementing Regulation (EU) 2022/791 establishes a common informational objective – the notification of stock levels of cereals, oilseeds, and rice to the Commission – but does not prescribe a uniform national mechanism for collecting the data. Member States therefore retain considerable organisational autonomy: they may rely on professional stock accounting, targeted electronic declarations, broader food-security platforms, or register-based systems integrated into existing agricultural databases. This autonomy is consistent with the principle of subsidiarity and with the diversity of national administrative traditions, farm structures, and IT infrastructures.

However, the absence of common methodological criteria is not without consequences. Divergent reporting frequencies, different definitions of relevant operators, different product scopes, and different data-collection channels may affect the comparability of the information transmitted to the Commission. The issue is not that legal diversity is unlawful in itself, but that market-monitoring tools are useful only if the data they generate is sufficiently comparable, timely, and reliable at the EU level. A monthly system targeted at professional intermediaries and a quarterly system based on annual thresholds may both comply with EU notification duties, but they do not necessarily produce data with the same granularity, temporal sensitivity, or coverage of the supply chain.

For this reason, the current framework points less towards the need for a single European cereal-stock register than towards a more realistic form of minimum

methodological convergence⁽²⁴⁾. Without imposing a uniform IT architecture, the Commission could, if considered necessary, develop common guidance on certain essential elements: the definition of stock declaration units, the identification of relevant operators, the degree of aggregation required, the minimum data set to be transmitted, confidentiality safeguards and interoperability between national platforms and EU market-observation tools. Such an approach would preserve national institutional diversity while improving the reliability and comparability of EU-wide cereal stock information.

In this perspective, “Granaio Italia” should not be read as an isolated national experiment. Rather, it represents one of the most developed attempts within the EU to translate stock-notification duties into a permanent agricultural data infrastructure. Its comparative relevance lies precisely in this ambivalence: it offers a potentially advanced model of digital market monitoring, but also highlights the risks associated with divergent national reporting systems, particularly in terms of proportionality, administrative burden, data comparability, and confidentiality.

XIII Conclusions: Critical Assessment and Future Prospects

Several years after its first appearance in the Budget Law, “Granaio Italia” now appears less ephemeral than many operators initially assumed: it is no longer just one more legislative announcement destined to be postponed sine die, but an information infrastructure which, from 2025 onwards, will become a stable feature of the day-to-day operations of larger arable farms, cooperatives and commercial and first-processing enterprises in the cereals sector. The overall assessment, however, is far from unambiguous.

On the positive side, the system has the merit – at least for cereals – of rationalising and centralising a large volume of information that previously circulated in a fragmented way among internal registers, statistical declarations, tax databases, and regional systems. It helps to connect more directly the micro level of physical product movements with the macro level of agricultural and market policy choices, both at the national and EU level. In this sense, the register responds to a genuine public need: agricultural markets increasingly require reliable, timely, and comparable data, particularly where price volatility, supply shocks, and food-security concerns make purely ex post statistical tools insufficient.

24 Atik (2022).

If MASAF can make intelligent use of the data collected – providing the sector with analyses, indicators, and, above all, more timely and better-targeted intervention decisions – “Granaio Italia” may come to be perceived, at least by more structured operators, as a “reasonable” administrative cost in relation to the benefits of greater market governability. This positive outcome, however, is not automatic. It depends on whether the system will be implemented as a proportionate data-governance tool rather than as a merely additive reporting obligation.

On the critical side, however, at least three aspects should not be underestimated. First, the legislative and regulatory technique – with successive redraftings of the basic legal provisions, implementing decrees amended after only a few months, repeated extensions of the sanctioning regime, and guidance documents that are still partly evolving – has fostered uncertainty and mistrust, reinforcing the perception of a “moving target” obligation that is difficult to navigate. This makes it all the more urgent, and no longer postponable, for the administration to provide consolidated interpretative guidance that definitively clarifies the personal scope of application, the logic of thresholds, and the criteria for coordination with other registration obligations. Without such guidance, uncertainty may affect not only compliance behaviour, but also legal certainty and legitimate expectations, especially for operators situated near the quantitative thresholds or operating through complex contractual and storage arrangements.

Secondly, the risk of overlap with other reporting requirements is real. Without an explicit process of integration (including technological integration) between “Granaio Italia”, the digital farm dossier, warehouse registers, feed traceability systems, and tax instruments, the system will be perceived as yet another “layer” of bureaucracy, especially by enterprises already operating with tight margins and lean administrative structures. This concern is particularly acute for medium-sized operators, which are often large enough to fall within the scope of the register but not sufficiently structured to absorb the marginal cost of quarterly data consolidation, digital transmission, and documentary reconciliation in the same way as large cooperatives or first-processing undertakings.

Thirdly, the question of how the information collected is protected remains open. In the medium term, the sector will accept a register of this kind only if it is confident that the data are genuinely protected, used for purposes of general interest, and not exposed, even indirectly, to the risk of misuse or undue competitive interference. The protection of data should therefore not be regarded as a merely technical issue, but as a condition of institutional

legitimacy. Where stock data, commercial flows, and farm-level information are centralised within the same public digital infrastructure, confidentiality, purpose limitation, access governance, and safeguards against indirect disclosure become essential elements of the proportionality assessment.

In this scenario, prospects will largely depend on political and administrative choices to be made in the coming years. One possible direction is to “normalise” “Granaio Italia” as an ordinary component of the digital farm dossier, providing, also through technical agreements with CAAs and with the providers of the main management software, for forms of pre-filled declarations and automatic acquisition of data from documents already present in farm IT systems, thereby minimising manual data entry and duplication of information. Such a development would be decisive in transforming the register from a stand-alone compliance burden into an integrated administrative service.

A second direction concerns institutional transparency. The legitimacy of the register depends on the ability of the Ministry and the Regions to feed back to stakeholders, regularly, aggregated analyses of cereal flows at the national level, showing in concrete terms how the data supplied by enterprises contribute to more informed decisions (for example, in managing price crises, designing coupled support schemes, or implementing policies to promote Italian durum wheat). In the absence of this feedback loop, operators may perceive the system as a one-way extraction of information rather than as a shared infrastructure for market governance.

Finally, in a broader sense, “Granaio Italia” can serve as a testing ground for a new phase in the relationship between agricultural enterprises and the public administration. If it remains merely a sanction-focused register, it will be perceived as yet another burden. If, instead, it becomes a prototype of an “intelligent” use of agricultural data – capable, over time, of reducing other redundant reporting obligations and of strengthening the negotiating position of the Italian cereals sector vis-à-vis markets and EU institutions – it may, despite the difficulties of its debut, come to represent one of the most significant building blocks in the transition towards genuinely digital governance of the supply chain. Its success will therefore not be measured only by the number of declarations collected or by the formal completeness of the database, but by the administration’s ability to transform those declarations into reliable, useful, and legally protected knowledge. In this respect, the real challenge is to ensure that “Granaio Italia” remains proportionate: justified by genuine market-monitoring needs, limited to clearly defined purposes, interoperable with existing

systems, and capable of returning value to the operators that bear the cost of producing the data.

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