



IUCN European Union Representative Office  
64 Boulevard Louis Schmidt [REDACTED]  
1040 Brussels, Belgium [REDACTED]  
www.iucn.org/europe europe@iucn.org

Dr. H. Bleker  
Minister for Agriculture and Foreign Trade  
Ministerie van Economische Zaken, Landbouw en Innovatie  
Postbus 20401  
2500 EK Den Haag  
The Netherlands

7 December 2011

Your Excellency,

On behalf of IUCN, the International Union for Conservation of Nature, I am writing regarding recent developments in nature conservation policy in The Netherlands, which IUCN believes could have a serious negative impact on biodiversity and ecosystems in The Netherlands, and on international policy obligations.

IUCN is concerned that the proposal for a new Nature Bill (Wetvoorstel natuur), which was published on 6 October 2011, does not guarantee full compliance with international treaties such as the Convention on Biological Diversity (CBD), the Ramsar Convention on Wetlands, and the Convention on International Trade in Endangered Species (CITES). As The Netherlands is signatory to these conventions, full compliance with the conditions of these treaties is required.

I would like to highlight the proposal in the Bill to end the strict protection under current Dutch legislation of 149 species. National and international Red Lists of threatened species are internationally accepted as a basis for national policy making and legislation. Such a provision is also in line with the 2020 Aichi Biodiversity Targets, which are supported by the Dutch government. We are also concerned that the scientific advisory role and independence of the CITES review commission has been affected, which threatens to weaken the scientific basis for policy development in ecosystem management and international biodiversity conservation.

We believe that the preliminary agreement to decentralise policies on and management of nature to the Dutch provinces may lead to negative impacts on biodiversity, unless the conditions are clearly described, and there is monitoring and guidance from national level. A particular concern is that the current proposal will have serious consequences



IUCN European Union Representative Office  
64 Boulevard Louis Schmidt [REDACTED]  
1040 Brussels, Belgium [REDACTED]  
www.iucn.org/europe europe@iucn.org

for the effectiveness of the National Ecological Network (EHS), which is an important and internationally exemplary instrument to support biodiversity in face of climate change.

Although IUCN understands the necessity during these harsh economic times to look critically at the budget for nature conservation, we fear that the adoption of the proposed Nature Bill in its present form, including your remarks on 30 November, will have serious negative impacts on biodiversity, ecosystems and the economy in The Netherlands, and may affect its international obligations with regards to CBD, CITES and other international conventions.

The IUCN National Committee of The Netherlands and the IUCN Regional Office for Europe stand ready to offer our expertise and experience for instance to organise a national debate about these and other critical issues of relevance to nature conservation policy of The Netherlands. I would welcome the opportunity to meet at your earliest convenience to discuss our concerns in more detail.

Please accept, Your Excellency, the assurances of my highest consideration.

Hans Friederich  
Regional Director, Europe

[REDACTED]