

European Commission
Directorate-General for the Environment
Mr Humberto Delgado Rosa
Avenue de Beaulieu 5
1160 Bruxelles
Belgique

Datum April 12th 2016
Behandeld door Kirsten Haanraads
Telefoonnummer 0031 6 179 84 362
Ons kenmerk 21120 128

Dear Mr Delgado Rosa,

On behalf of six Dutch organizations for the protection of nature and the environment, we would like to express our deep concerns.

On January 14th 2016, the Dutch Ministry of Economic Affairs has informed the Dutch Parliament about the national levels of production of phosphate. The provisional prognosis was an exceedance of the production limit caused by a production of 176.3 million kilos phosphate.

The Dutch Ministry of Economic Affairs has expressed their intention to plea at your Committee on the abolition of the production limit of phosphate for the period 2018 - 2021. Under the current Sixth Action Programme, and as part of the derogation agreement with your Committee, the phosphate production limit within the Netherlands is set at 172,9 million kilos phosphate, in agreement with the national production level in the year 2002.

Your Committee has always emphasized the importance of limitations set on the production of phosphate in order to reach a better and healthier environment through improving water quality.

We consider the intention of the Dutch Ministry of Economic Affairs premature and undesirable for several reasons:

1. Dutch water quality does not meet the standards the Water Framework Directive holds. Adjustments made to the conditions agreed to within the Nitrates Directive must therefore lack support.

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2. Reducing nitrates is an integral part of the Water Framework Directive. Dutch legislation designed to meet the goals of the Water Framework Directive is not yet evaluated. Nutrifcation, however, was and remains tot this day, a significant problem for water quality and water extraction.
3. There is a negative incentive to member states when an increased phosphate production would be rewarded with the abolition of the production limit.

We urge you to reaffirm the need for member states to fulfill their current agreements if water quality is not truly of aimed quality.

We await your reply with interest,

Yours Faithfully,

**NATUUR
& MILIEU**



Tjerk Wagenaar
Director Stichting Natuur en Milieu

 **milieudefensie**
Friends of the Earth Netherlands



Donald Pols
Director Milieudefensie


Vogelbescherming
NEDERLAND



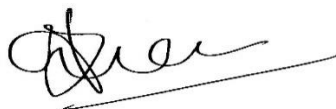
Fred Wouters
Director Vogelbescherming

 **WNF**



Johan van de Gronden
Director Wereld natuur Fonds

 **Natuurmonumenten**



Teo Wams
Director Nature Conservation

 **de natuur en
milieufederaties**

On behalf of De Natuur- en Milieufederaties



Nol Verdaasdonk
Director Brabantse Milieufederatie