Memorandum on Scope and Details (NRD) National Environmental Programme (NMP)

Citizen’s summary

4 August 2022

Introduction

In its '*National Environmental Policy Framework (NMK), A Clear Task: building blocks for a safe, healthy and clean living environment*', published in February 2020, the government affirmed its commitment to making our living environment healthy, clean and safe.

The National Environmental Programme (NMP) fleshes out the ambition to make the Netherlands healthy, clean and safe by 2050. In so doing, the NMP also explores the agreements reached with other countries in Europe and elsewhere in the world.

A strategic environmental assessment (SEA) will be carried out to support decision-making concerning the NMP. The main purpose of the SEA is to ensure that we are as certain as we can be, in advance, that the actions set out in the programme will actually make the Netherlands healthy, clean and safe. The SEA will also indicate whether the impact of those actions might be felt in key areas other than the environment.

The Memorandum on Scope and Details (NRD) is the first step towards a SEA, outlining the approach to be taken with regard to:

- what topics the SEA will address;
- what types of decisions will be assessed;
- how the SEA will be carried out;
- what impacts it will examine.

In a specific section of the SEA, known as an appropriate assessment, particular attention will be paid to the NMP's impact on the natural environment in the Netherlands' Natura 2000 areas.

Based on the NRD, anyone can air their views about the approach to be used in the SEA. The Netherlands Commission for Environmental Assessment is an independent body tasked with ensuring that the SEA is conducted properly. It will issue an advisory opinion on the matter.

Connection between the Memorandum on Scope and Details (NRD), the strategic environmental assessment (SEA), the appropriate assessment and the National Environmental Programme (NMP)

The NRD specifies the approach to be used in the strategic environmental assessment and the appropriate assessment that are to be drawn up for the NMP. **The strategic environmental assessment and the appropriate assessment** will provide information to support decisions concerning the NMP. The **NMP** sets out measures to make the Netherlands healthy, clean and safe.

The National Environmental Programme

The National Environmental Programme (NMP) aims to reduce environmental pollution in Netherlands by 2050 to the point that it poses only very minor risks, if any, to public health and the natural environment. The government does not want polluting activities in the Netherlands to be moved to other countries, since this would have a harmful impact on people and the natural environment in those countries. The government also wants its decisions to improve the lives both of people in the Netherlands today and in the future.

Countries throughout the world are joining forces within the framework of the United Nations (UN). The UN has identified three major problems that threaten the future of our planet. These are:

1. Climate change
2. The extinction of animal and plant species
3. The pollution of our environment.

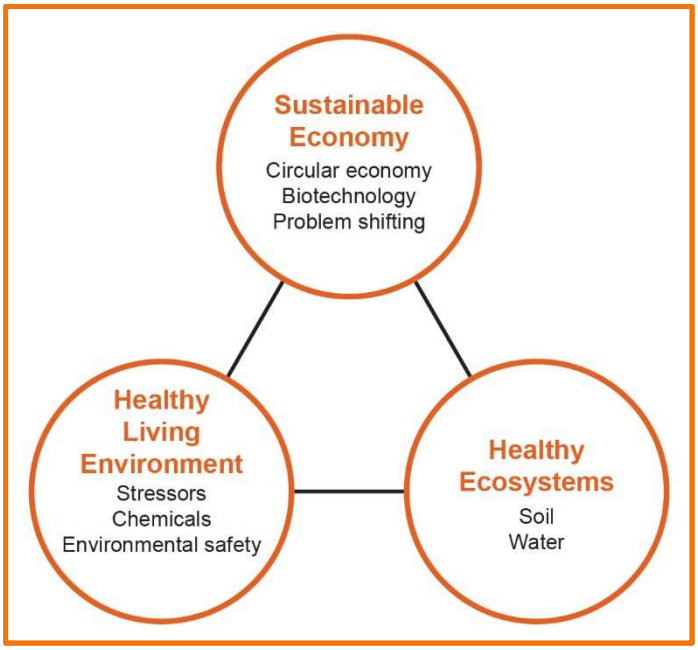
In the Netherlands, a great many parties reached agreement on measures to limit and prevent climate change, laid down in the National Climate Agreement. Agreements have also been reached under the Strengthening Biodiversity Programme to conserve various species of animals and plants. The NMP focuses on the third major problem, the pollution of our environment.

The NMP will include objectives and actions designed to make the Netherlands healthy, clean and safe in the long term (2050), but also to achieve improvements by 2030. We will continually monitor the implementation of these actions and whether the objectives are being achieved. If this is not the case, new actions will be initiated to ensure that the objectives are indeed achieved. Thus, ongoing monitoring will ensure that the most effective actions are taken, with a view to making the Netherlands healthy, clean and safe. These actions include environmental regulations that everyone is required to comply with. But they also include invitations to other parties, such as businesses and members of the public, to take their own initiatives to benefit the environment.

The NMP **fleshes out three main challenges**:

- *Healthy Ecosystems*, which is about clean soil and clean water in the Netherlands.
- *A Healthy Living Environment*, which is about improving the health and safety of people and the natural environment by, for instance, reducing noise nuisance and levels of unhealthy substances in the air that we breathe, and mitigating the risks of environmental accidents (e.g. an exploding gas storage tank).

- *A Sustainable, Circular Economy*, which is about phasing out the use of depletable resources and manufacturing products that do not generate waste (because the 'waste' can be used in new products).



Current state of the environment, trends and challenges

The first step was to find out how healthy, clean and safe our environment is today, and what might happen if we take no new actions. Existing reports were used for this purpose. Given its comprehensive expertise in environmental, health-related, and safety matters, the National Institute for Public Health and the Environment (RIVM) assisted in this endeavour.

The quality of the environment improved substantially between 1970 and 2000. Since the year 2000, there have been few improvements to the environment. Indeed, a number of new environmental problems have emerged. These include climate change, biodiversity loss (extinction of animal and plant species), resource depletion, and new instances of soil and water pollution involving harmful substances such as PFAS, pharmaceutical residues and microplastics. These problems will also have major adverse impacts in the Netherlands, in terms of food supply, water management, health and prosperity.

The **situation regarding Healthy Ecosystems** is as follows:

- Some 250,000 sites in the Netherlands are or may be seriously polluted. Most of the sites that pose a major risk to people have been tackled. Pollution with poly- and perfluoroalkyl substances (PFAS) have generated a new set of problems. Other soil pollutants are substances of very high concern (SVCHs), pharmaceutical residues and microplastics. Most soils are home to a diversity of tiny creatures and plants. These soil organisms keep the soil healthy and clean, but intensive land use and the presence of hazardous substances threaten their existence. We are increasingly dependent on the soil for such things as new types of energy, adapting to a changing climate, transitioning to sustainable agriculture, and the reuse of resources.
- In 2020, just 5% of **water** in the Netherlands met the ambient water quality standards (good chemical quality). In 2018, about 50% of this water met the standards for nitrogen and phosphorus. Measurements made from 2015 to 2017 revealed excessive levels of 49 pollutants in one or more bodies of water. At a number of sites, the accumulation of different substances causes adverse effects on people's health, while also leading to the disappearance of increasing numbers of animal and plant species.
- According to the river basin management plans (2022) the **groundwater** quality in most areas meets the set targets. In 2017, almost all shallow aquifers and two fifths of the deep aquifers were found to contain man-made chemicals. Pesticide residues were found in half of all groundwater samples. New substances were found in 75% of the samples. A wide range of groundwater pollutants are now being found at ever increasing depths. While the quality of drinking water in the Netherlands is very good, the quality of the country's water resources is a source of concern.
- There are also concerns about the volume of groundwater, due to insufficient rainfall. Groundwater abstraction for agricultural and other purposes has increased in recent dry years (2018 to 2020). River outflows have increased, as have average temperatures.
- In general, the Netherlands has sufficient **freshwater** available, but demand sometimes exceeds supply.

The **following developments** are of key importance for **Healthy Ecosystems**:

- Increasing climate change and need to adapt to the changing climate.
- The extinction of animal and plant species.
- The use (and reuse) of resources.
- The transition to sustainable agriculture.
- The housing sector.
- The transition to renewable energy.
- New threats posed by new pollutants.
- Ambient water quality is improving, but not fast enough.

First impression of **our task with regard to a Healthy Ecosystem**:

- First establish the quality of soil and water before deciding on plans for new development.
- Ensure that the soil is clean and healthy, as this is the cornerstone of environmental quality.
- Decontaminate polluted soils.

- Lay down clear rules concerning the reuse of resources and building materials in the soil.
- Prevent any shortfalls and pollution of groundwater.
- Help to achieve water-quality improvement targets.
- Improve the health of animal and plant species by reducing environmental pollution.

The **situation regarding the Healthy Living Environment** is as follows:

- Key **stressors** for people are sound, light and vibration. Aside from noise caused by neighbours, which does not feature in the NMP, transport-related noise (from road traffic, aviation and trains) is a major source of nuisance. Next in line is the noise generated by industry and other economic activities. Total noise exposure is very high in the city of Amsterdam, around Amsterdam Airport Schiphol and Rotterdam's port area, and along motorways. Serious noise nuisance is increasingly caused by Low Frequency Noise (LFN), a deep humming or buzzing sound produced by ventilation systems or air conditioners, for example. More light is emitted in the Netherlands than in Germany or France. Glasshouse horticulture in the Randstad region emits a great deal of light. 5% of Dutch people are affected by serious light pollution, and 3% experience disturbed sleep. Road and rail traffic, in particular, generate vibrations that can cause nuisance to people and damage to buildings. There is virtually no legislation to prevent this.
- **Chemicals** have an enormous impact on healthy living environments. Air quality in most parts of the Netherlands complies with legal standards. Yet air pollution still reduces life expectancy by almost one year. This is because the European and national statutory requirements strike a balance between health on the one hand and the feasibility of the adopted standard on the other. Even small quantities of air pollution can be harmful, because air pollution is everywhere and everybody is breathing polluted air throughout their life. The World Health Organization (WHO) has issued new air quality guideline values, but air quality in many parts of the Netherlands falls short of these values. The levels of air pollution created by traffic, livestock production, wood-burning stoves and industry vary from one place to another. Fine particulate matter is a harmful substance generated by traffic, livestock sheds, industry and wood-burning stoves. Another harmful substance is nitrogen dioxide (NO2), and atmospheric levels exceed the WHO's guideline values. Odour nuisance is generated by barbecues/braziers, livestock sheds and road traffic. From 2016 to 2019 there was an increase in odour nuisance, due to open fireplaces and multifuel boilers, barbecues, braziers and sewerage systems. Substances of very high concern (SVHCs) pose a new challenge. They are present everywhere in the environment. They are carcinogenic, interfere with reproduction, or accumulate in plants, animals and people. Microplastics are also found everywhere, including in human blood. Further research is needed to determine their harmfulness. Nothing is known about the exact extent of the damage to health incurred by chemical pesticides. In industrialised countries, long-term exposure to low concentrations is a source of concern.
- The transport of hazardous substances such as toxic, explosive and flammable products poses a risk to **environmental safety**. Around 240 million tonnes of hazardous substances are transported around the Netherlands via inland waterways, pipelines, by road and by rail.

Exposure to artificial radioactive radiation (and the risk thereof) is associated with energy production, healthcare, fundamental materials research, industrial applications and the processing of waste produced by these activities.

The **following developments** are of key importance for a **Healthy Living Environment**:

- The construction of numerous new homes.
- The transition to renewable energy sources.
- Fleshing out agreements reached with municipalities concerning cleaner air (Clean Air Agreement).
- Reducing the use of pesticides.
- The emergence of health risks associated with the use of new materials.

First impression of **our task with regard to a Healthy Living Environment**:

- Reduce air pollution.
- Reduce noise nuisance.
- Reduce irritating vibrations, such as those caused by heavy trains.
- Reduce light pollution for people and animals.
- Reduce polluting and harmful substances (including new ones).
- Mitigate the risk of accidents involving hazardous industrial activity and the transport of hazardous materials, and ensure that people actually feel safer as a result.
- Ensure that genuine improvements are made to the quality of the living environment.

The **situation regarding the Sustainable, Circular Economy** is as follows:

- An economy's degree of circularity is determined by its use of raw materials and energy. Another factor is the amount of waste created, and whether this 'waste' can be reused as a raw material for products. In the Netherlands, the consumption of raw materials per head of population is almost twice the European average. Almost half of our raw materials consumption derives from fossil energy carriers, such as oil and gas. This is much more than anywhere else in Europe, and is due to the high level of exports by the Dutch chemical and steel industries, refineries and horticulture sector. Personal consumption of raw materials in the Netherlands – per head of population – is actually lower than the European average. This is due to the Netherlands' high population density, which leads us to use space efficiently – in buildings and for infrastructure. The Netherlands processes 66 megatons of waste, 30% (20Mt) of which is imported. The main sources of waste are construction, industry and households. We generate almost 500kg of household waste per capita, per year. This corresponds to the European average. 80% of that 66Mt of waste (53Mt) is recycled. This includes the processing of kitchen and garden waste into compost. Recycling means that we require fewer and fewer 'new' raw materials to deliver the same amount of production value. Reuse is also on the rise. Nevertheless, our total consumption of raw materials is still increasing.

- In making the economy more sustainable, we must not lose sight of the risks associated with **shifting the problem** of environmental damage. Shifting problems means that we export them to other countries, we don't really solve them. It also means that solving one environmental problem creates a new one, or that we solve a problem today only to create new problems for our children tomorrow.
- **Biotechnology** enables us to make very precise modifications to plants, animals and microorganisms. Biotechnology is used to develop vaccines and medicines, for example, as well as biodegradable plastics, crops that are more disease-resistant and drought-resistant, and alternative proteins. This sector has a strong presence in the Netherlands. An increasing range of biotechnological products offers new opportunities to contribute to societal changes that foster sustainable developments, such as renewable energy, a circular economy and sustainable agriculture. New developments can however present new risks to public health and the environment. Some people may also object to the artificial modification of living organisms.

The **following developments** are of key importance for a **Sustainable, Circular Economy**:

- The Netherlands' growing population.
- Increased environmental pollution due to economic growth.
- Different ways of using things. A trend towards sharing instead of owning, as in car sharing schemes for example.
- More and more work being done by or with computers.
- Some people disregard environmental regulations.
- New environmental opportunities and risks associated with the reuse of goods and substances.
- New technological developments lead to new substances and materials.
- Steps towards an organic and sustainable economy

First impression of **our task with regard to the Sustainable, Circular Economy**:

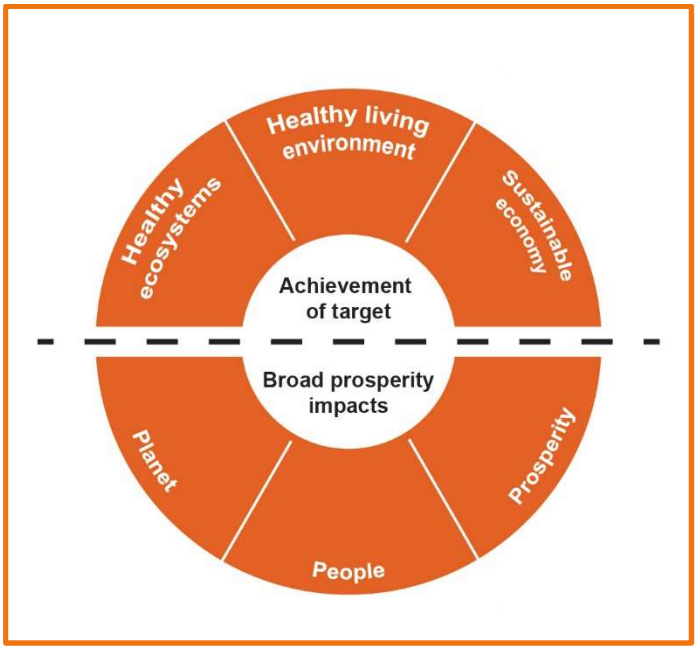
- Ensure that the Dutch economy will be sustainable by 2050.
- Ensure that new technological developments lead to less pollution rather than to new types of pollution.
- Ensure that potentially harmful and polluting activities can only be performed with a permit. Monitor the proper performance of these activities and enforce the regulations where necessary.
- Use financial tools to influence behaviour, by making polluting materials more expensive and clean materials cheaper.
- Ensure that economic growth does not result in more environmental pollution.

Policy actions and alternatives

The NMP fleshes out the tasks in terms of specific actions. New actions that are expected to have a clear environmental impact will be selected for inclusion in the SEA. These actions will be grouped into packages of mutually compatible actions in order to provide a range of alternatives. The SEA will examine these alternatives in terms of their contribution to the NMP's objectives and other key impacts on sustainability, people and the economy. This will help decision-makers to reach rational and prudent decisions on the actions and measures that will ultimately feature in the NMP. The diagram below shows how the actions are selected for assessment.

Assessment framework

An 'assessment framework' has been drawn up for the purposes of the strategic environmental assessment. It lists the aspects on which the actions are to be assessed. The assessment framework consists of two parts. The first part is an assessment of the extent to which the main objective of a 'healthy, clean and safe living environment' will be achieved. The second is an assessment of all those aspects ('broad prosperity') that matter in terms of the planet, people, and prosperity. The assessments will be performed by experts.



The SEA examines the extent to which the following objectives will be met with regard to **Healthy Ecosystems**:

- the soil is not polluted with new substances, decisions take soil quality into account, and existing cases of pollution are effectively managed,
- steps are taken to counter groundwater pollution, and the requisite level of ambient water quality is achieved.

The SEA examines the extent to which the following objectives will be met with regard to a **Healthy Living Environment**:

- noise regulations are complied with, light pollution is limited, and damage or nuisance due to vibrations is prevented,
- air quality complies with WHO air quality guidelines, odour nuisance is managed, harmful substances are banned, and use of harmful pesticides is reduced;
- there is no significant damage to health caused by hazardous and nuclear substances.

The SEA examines the extent to which the following objectives will be met with regard to a **Sustainable, Circular Economy**:

- use of raw materials is reduced, finite raw materials are substituted, waste is prevented and there is high-value reuse of products;
- problems are not shifted to other places, other environmental themes or future generations, and the polluter pays;
- developments in biotechnology include guarantees for the safety of people and the environment.

A list of assessment criteria will be drawn up to assess the impact on broad prosperity. The criteria to be used in this assessment will be selected at a later date. The list of potential criteria consists of:

- **People**: For instance: health, support and a pleasant living environment;
- **Planet**: For instance: climate change, nature and landscape;
- **Prosperity**: For instance: income, employment, costs and revenues.

Approach to Appropriate Assessment

The Appropriate Assessment explores the impact of actions listed in the NMP in terms of specific nature protection areas that are part of the Natura 2000 network. These Natura 2000 areas enjoy legal protection under the Nature Conservation Act, because they are home to rare and unusual animals and plants. In the Appropriate Assessment, experts estimate the impact of the actions listed in the NMP on protected animals and plants in the Natura 2000 areas.

Follow-up process

The process of drafting a SEA for the NMP comprises six steps:

1. Notification (summer 2022)
The public will be informed of the intention to prepare the NMP. This is referred to as notification. It is the official start of the SEA process and the development of the NMP.

2. Consultation on the scope and details of the strategic environmental assessment (summer 2022)
The Memorandum on Scope and Details provides everyone with the information they need to make suggestions for the SEA. In the planning process this is known as submitting ‘views’. The provincial authorities, water authorities and municipalities are also asked for their views on the content of the SEA, as are neighbouring countries, as the impact of these plans could be felt beyond the borders of the Netherlands. The Netherlands Commission for Environmental Assessment will issue an advisory opinion concerning the content of the SEA.

3. **Decision on scope and details (autumn 2022)**

Based on the ideas and recommendations that emerge from the consultation and on the Netherlands Commission for Environmental Assessment's advisory opinion, the Minister of Infrastructure and Water Management will determine the scope and details of the strategic environmental assessment that is to be drawn up. The SEA will describe how these ideas and recommendations were taken into account.

4. Drawing up the strategic environmental assessment (autumn 2022 - spring 2023)

In early November 2022, details of how the views submitted will contribute to the SEA will be published, in the form of a summary.

5. Notification of the strategic environmental assessment and the draft NMP (spring 2023)

The SEA will be published at the same time as the draft NMP. Everyone will then have another opportunity to give a response. The Netherlands Commission for Environmental Assessment will review the quality of the SEA.

6. Drawing up and adopting the definitive NMP (late summer 2023)

Based on the responses received and on the recommendations arising from the Netherlands Commission for Environmental Assessment's review, the Minister of Infrastructure and Water Management will formally adopt the NMP. The Minister will also give details of the part played by the SEA, the views and the advisory opinions.