

ADVICE

To the Minister of the Interior and Kingdom Relations,
acting Minister of Economic Affairs, Minister of Climate and
Green Growth, Minister of Housing and Spatial Planning,
acting Minister of Infrastructure and Water Management,
and Minister of Agriculture, Fisheries, Food Security and
Nature
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Subject: **Working together to do better: recommendations for national policy on the physical environment in the Caribbean Netherlands**

Dear Ms Uitermark, Mr Heinen, Ms Hermans, Ms Keijzer and Ms Wiersma,

We are pleased to hereby offer you our advisory report '*Working together to do better — recommendations for national policy on the physical environment in the Caribbean Netherlands*'. The advisory report is also offered, in parallel, to the Chairs of the Dutch Senate and House of Representatives and to the Executive Councils of Bonaire, Sint Eustatius and Saba.

RATIONALE

This advisory report describes the most appropriate way of formulating policy on the physical environment on Bonaire, Sint Eustatius and Saba. It concerns an advice, requested by the State Secretary for Digitalisation and Kingdom Relations, which was included in Rli's work programme 2024–2025. Starting point is the responsibility that the national government bears for the Caribbean Netherlands as a fully fledged region of the Netherlands. The Dutch Cabinet's government programme states the following on this subject:

'The Cabinet feels a natural responsibility towards the residents of the public bodies of Bonaire, Sint Eustatius and Saba — collectively known as the Caribbean Netherlands — which are fully fledged parts of the Netherlands. The guiding principle here is that of "comply or explain". In addition, the Cabinet also takes into account that these islands each have their own unique context.' (Schoof Cabinet, 2024).

The last sentence of the above quote refers to the fact that the Caribbean Netherlands has many characteristics that distinguish it from European Netherlands. There are major differences, not only in terms of geography and climate, but also regarding cultural history. In addition, there are substantial differences between the three islands. The national government obviously needs to take

these differences into account when formulating policy¹ on the physical environment. However, the Advisory Division of the Dutch Council of State has warned that differentiation in policy with respect to the Caribbean Netherlands should never lead to a reduction in constitutional guarantees or to arbitrariness (RvS, 2019).

Despite the ruling of the Council of State, there are signs that, in practice, there are unjustifiable differences in government policy between European Netherlands and the Caribbean Netherlands. These signs were derived from certain reports, including those by the Netherlands Institute for Human Rights (2024), the Caribbean Netherlands Social Minimum Committee (2023) and the Council for Public Administration (2024).

Recently, the State Committee Demographic Developments Caribbean Netherlands 2050 also called attention to unjustifiable differences in policy efforts, with the national policy on housing and infrastructure as a specific example. The State Committee pointed out that, for example, the basic housing and road infrastructure on Bonaire essentially dates back to the constitutional reforms of 2010 (see below), at which time the population of Bonaire was approximately 10,000 inhabitants. The island's current infrastructure is not geared to the current population of 24,000, let alone to the projected doubling of that number in the coming decades (Staatscommissie, 2024). National government funding for Bonaire has been insufficiently attuned to this situation, which has resulted in major backlogs. During a discussion in October 2024 with the Dutch House of Representatives, Van Zwol, the State Committee Chair, commented the following on this matter:

'It can be compared with a situation where the municipalities in European Netherlands would still have to make do with the (...) road infrastructure and associated funds from the 1950s. This really represents a flaw in our system' (Zwol, 2024).

This flaw is partially being addressed by a number of recent policy initiatives, including the Bonaire Housing Deal (Ministry of Housing and Spatial Planning (VRO), 2023a) and the Housing and Spatial Planning Policy Agenda for the Caribbean Netherlands (Ministry of Housing and Spatial Planning (VRO), 2023b). These policies are primarily focused on housing. They do not yet address the deficiencies of the road infrastructure.

The increase in the discretionary payment in the BES fund, which was implemented last year, has also improved the financial position of the islands.² This is a first step towards correcting the skewed financial relationships and contributes to restoring the abovementioned flaw (see 'our analysis' section).

QUESTION AND SCOPE OF THIS ADVISORY REPORT

This advisory report examines the extent and ramifications of the differences in national policy on the physical environment between European Netherlands and the Caribbean Netherlands. In doing so, the report builds on the 2023 advisory report *Elke regio telt!* (i.e. every region counts) which was drafted in collaboration with the Council for Public Administration (ROB) and the Council for Public Health and Society (RVS). That 2023 report presents proposals for a new approach to the large, growing and undesirable differences in prosperity and well-being between the various regions in European Netherlands. (Rli, ROB & RvS, 2023).

¹ We use the term policy commitment as an umbrella term for drafting and implementing legislation and regulations, policies that do not require legislation, subsidy schemes and (implementation) programmes.

² BES fund is the budgetary fund that finances Bonaire, Sint Eustatius and Saba. Some of the money is distributed in the form of discretionary grants. These are comparable to the general grants that municipalities in the European Netherlands receive from the Municipal Fund.

The central question of the current advisory report is: *What is the extent of potential and/or existing undesirable differences between European Netherlands and the Caribbean Netherlands when it comes to national policy on the physical environment and its implementation?*

In answering this question, the report specifically addresses the way in which the national government implements the *comply-or-explain* principle in the physical environment. This principle, which the Schoof Cabinet's Government Programme refers to, has formally been the starting point for the national government since 2019 (BZK, 2019).

The premise of *comply or explain* is that all policy intensification measures for European Netherlands also apply to the Caribbean Netherlands, unless there are reasons not to do so (BZK, 2023a). The concept of policy intensification is broadly defined. It involves drafting new or amending existing legislation, developing or amending policy that does not require legislation, and drafting or amending subsidy schemes and implementation programmes (BZK, 2019). For example, if the national government passes a new law to address the housing shortage in European Netherlands, this law in principle should also apply to the Caribbean Netherlands. Or, for example, if climate adaptation measures are being implemented in European Netherlands, these measures should also be implemented in the Caribbean Netherlands.

There may be good reasons for not implementing particular policy intensification measures in the Caribbean Netherlands, or for applying them differently. For example, due to geographical, climatic or cultural-historical differences.³ In those cases, the *explain* clause applies.⁴ The goal of *comply or explain* is therefore not to apply the exact same policy intensification measures in both European Netherlands and the Caribbean Netherlands. The Ministry of the Interior and Kingdom Relations (BZK) (2023a) writes the following about this:

'The suitability of tailor-made measures in the local context is of great importance. This transcends the importance of alignment with European or Dutch regulations or systems. Customisation is needed, based on well-considered choices.'

The essence of the *comply-or-explain* principle, thus, consists of carefully assessing whether policy intensification measures should either be implemented, not implemented, or amended.

WORK METHOD FOR THIS ADVISORY PROCESS

In 2024, in preparation for this advisory report, we commissioned a preliminary study by the consultancy firm Witteveen+Bos. They investigated how the Caribbean Netherlands is currently included in the Dutch national policy for the physical environment (Witteveen+Bos, 2024). The results from the preliminary study formed the starting point for the current advisory report. In addition, we built on several recent studies on national policy implementations for the Caribbean Netherlands, including the final report on the study of island tasks and resources in the Caribbean Netherlands ('*Eindrapport onderzoek eilandelijke taken en middelen Caribisch Nederland*', IdeeVersa, 2023), as well as the report on targeted growth ('*Gerichte groei*') by the aforementioned State

³ The Knowledge centre for policy and regulation describes the following criteria that may give cause to deviate: (a) insularity, (b) geographical distance both from European Netherlands and within the Caribbean Netherlands, (c) small scale, (d) climatic conditions, (e) geographical conditions, (f) financial capacity, (g) cultural differences, (h) ties with Aruba, Curaçao and St. Maarten, and (i) economic and social conditions (see KCBR, 2025a).

⁴ The final memorandum on the comply-or-explain principle ('*Eindnotitie uitwerking comply or explain*') distinguishes four variants: (1) comply: in which the Caribbean is fully included in the policy process; (2) comply: in which the Caribbean Netherlands is awarded a special status within the policy process; (3) explain: in which the Caribbean Netherlands is not included in a certain policy process but in another one; and (4) explain: in which the Caribbean Netherlands is not included in the policy process (see KCBR, 2025b).

committee on demographic developments Caribbean Netherlands 2050 (Staatscommissie demografische ontwikkelingen, 2024) and the report on the financial challenge regarding the physical infrastructure in the Caribbean Netherlands (*'Klein gebied, grote opgave'*, AEF, 2025).

For this advisory process, we held discussions with employees on Bonaire, Sint Eustatius and Saba, the ministries involved, the National Office for the Caribbean Netherlands (RCN), and a number of individual experts. And, lastly, we submitted the draft advice for consideration to the executive committees of the three public bodies, the departments involved and Mr Glenn Thodé as external reviewer. We took their comments into account when finalising our advice.

In this advisory process, partly in view of the considerable number of reports that have recently been published concerning the Caribbean Netherlands, we opted for a compact advisory process without any working visits to the islands. We recognise that this approach also has its disadvantages. For example, we lack reflections and personal viewpoints that would have been addressed in an alternative approach, particularly those of local residents and businesses on the islands.

The earlier advisory report, *Elke regio telt!* (Rli, ROB and RVS, 2023) emphasised the importance of discussions with experience experts. If insufficient account is taken of the perception and experience of those in the regions, there is a risk of them not feeling heard, let alone being understood. In our advice, we are therefore reluctant to pass judgement on the policy differences between European Netherlands and the Caribbean Netherlands. Instead, we refer to potentially undesirable differences. Even if these differences are the result of agreements between national government and public bodies, they could nevertheless be undesirable. For example, because changes in tasks require a new approach or because the agreed differentiation does not lead to the intended results.

DIVISION OF TASKS BETWEEN THE NATIONAL GOVERNMENT AND PUBLIC BODIES

During the constitutional reforms of 10 October 2010, the various tasks were divided between the national government and public bodies (Comissie Spies, 2015). Per that date, the Netherlands Antilles were dissolved. Since then, Curaçao and Sint Maarten, like Aruba, have been countries within the Kingdom of the Netherlands. The islands of Bonaire, Sint Eustatius and Saba have since been public bodies of the Netherlands.⁵

Within the Netherlands, a distinction was made between European Netherlands and Caribbean Netherlands (Bonaire, Sint Eustatius and Saba). Caribbean Netherlands has no provinces, municipalities or water boards. All tasks are divided between the public bodies and the national government (Witteveen+Bos, 2024). With respect to the physical environment, most tasks were assigned to the public bodies (IdeeVersa, 2023). They are basically responsible for all tasks that, in European Netherlands, are assigned to municipalities, water boards and provinces. They have also been given tasks that, in European Netherlands, are carried out by the national government. This includes the tasks related to sea ports and airports. For example, the government is — either directly or indirectly — a shareholder in various airports and sea ports in the European Netherlands. In addition, it also invests in five so-called sea ports of national importance through the MIRT, for example.

The discussions held during the advisory process have shown that this division of tasks can be explained by the former national government's viewpoint that tasks in the physical environment

⁵ A public body is a government agency that is considered a juridical person with specific powers and that performs defined tasks within a specific territory or area of activity. For example, previously, the Netherlands had public bodies such as "De Wieringermeer", "De Noordoostelijke Polder" and "De Zuidelijke IJsselmeerpolders".

should be assigned to local authorities wherever possible, and by the public bodies' desire for a high degree of autonomy.

In European Netherlands, the view on national government tasks with respect to the physical environment has changed considerably since 2010. The major challenges in the areas of housing, spatial development, energy and accessibility demand a firm responsibility on the side of the national government (e.g., Rli, 2021). The prominent role of the physical environment in the ambitions of the Schoof Cabinet's Government Programme is in line with this changed view. This advisory report also analyses how the thinking about the Caribbean Netherlands has developed.

OUR ANALYSIS

Our analysis results in the following four findings:

1. Large and diverse challenges within the physical environment

The Caribbean Netherlands faces major challenges with respect to the physical environment. The table below summarises some of these challenges and the corresponding quantitative data, based on the report on targeted growth, '*Gerichte groei*' (Staatscommissie demografische ontwikkelingen, 2024).

Challenge	Specific data, per island
Housing Significant increase in housing is needed, due to: <ul style="list-style-type: none"> • population growth • increase in the ageing population (number of people over the age of 65) 	Population growth up between 2023 and 2050 <ul style="list-style-type: none"> • Bonaire: from 24,100 to 30,600 • Sint Eustatius: from 3,300 to 4,200 • Saba: from 2,000 to 2,400
Infrastructure Significant investments in infrastructure are needed, due to: <ul style="list-style-type: none"> • maintenance backlogs • increase in the number of inhabitants 	Increase in grey pressure (the number of people over 65 as a percentage of the number of 20- to 64-year olds) between 2023 and 2050 <ul style="list-style-type: none"> • Bonaire: from 21% to 28%–60%; • Sint Eustatius: from 22% to 30%–100% • Saba: from 23% to 23%–55%
Spatial development Significant investments in spatial development are needed, due to: <ul style="list-style-type: none"> • climate risks • nature protection 	Climate risks <ul style="list-style-type: none"> • Bonaire: sea level rise and permanent inundation • Sint Eustatius and Saba: increase in both the number and force of hurricanes
Restricting factors on all BES islands <ul style="list-style-type: none"> • Relatively one-sided economic structure that depends on only a few sectors • Relatively large physical barriers and high costs for trade and transportation • Dependence on a small professional workforce for the continuity of social services • Deceleration of spatial developments due to historically grown ambiguity about inheritance and property rights • New spatial developments may come at the expense of natural areas 	

2. There has been an increase in the implementation of policy since 2019, but this has been mainly outside the realm of the physical environment

After the constitutional reforms of 2010, the national government has worked according to the principle of 'legislative restraint'. This is intended to give all parties time to become used to the new administrative structure. The principle was applied, in practice, to both legislation and policy development (BZK, 2019). This explains why there have been only limited developments in policy and legislation related to the tasks above.

The aforementioned principle of *comply or explain* has been in effect since 2019. Since then, the national government has increased its policy intensification efforts for the Caribbean Netherlands on

various subjects. Our analysis shows that these policy efforts mainly take place outside the realm of the physical environment, which is illustrated by the fact that only 9 of the 47 priority dossiers that the government has identified in the context of *comply or explain* relate to the physical environment (BZK, 2024a).

This however does not mean that the national government has not adopted any policies on the physical environment. In the discussions that were held for this advisory process, various examples emerged of projects (e.g., about port infrastructure, waste processing and energy supply) or temporary financing schemes, such as the Sustainable Energy Incentive Scheme for the Caribbean Netherlands and the Caribbean Netherlands regional agreement (see also Witteveen+Bos, 2024). The policy implementation by the national government is being conducted while maintaining the agreed 10–10–10 division of tasks between public bodies and the national government. Other examples of specific policy intensification measures by the national government for the Caribbean Netherlands include:

- the Nature and environment policy plan Caribbean Netherlands 2020–2030 (LNV, IenW and BZK, 2020). In line with this, a land-based nature programme and a programme for the protection of the marine environment have also been launched. In addition, there are projects focused on topics such as agriculture, livestock farming, fishing and waste management (LNV, 2023);
- the Housing and Spatial Planning Policy Agenda for the Caribbean Netherlands (Ministry of Housing and Spatial Planning (VRO), 2023b) and the Spatial Development Programme for Caribbean Netherlands (BZK, 2024c). As previously described, a housing deal has also been made with Bonaire (Netherlands Government, 2024);
- the Climate Agenda: the pathway to climate-proof and sustainable islands (Kingdom of the Netherlands, 2024). In this context, and in collaboration with the public bodies, work is currently underway to draw up climate plans that focus on both mitigation and adaptation;
- the Establishments and Activities Decree BES (2024). This includes environmental regulations that companies must comply with. The decree also includes regulations regarding supervision and enforcement and the environmental impact assessment.

Because the policy is recent, there is as yet not much to say about its implementation. This is cause for concern. Various reports point to limited or insufficient implementation power on Bonaire, Sint Eustatius and Saba (e.g., see IdeeVersa, 2023 and ILT, 2024).⁶ It is illustrative that, at the public body of Sint Eustatius, approximately 25% of FTE is not filled (AEF, 2025). In many of the discussions we held for this project, it was also pointed out that this is not just a matter of implementation capacity but that attention should also be paid to the administrative capacity of public bodies (and the differences between them).

In addition, in earlier studies we also regularly observed that the implementation power of the national government falls short of the mark with regard to the physical environment (Rli, 2023a; 2023b). These publications also draw attention to both implementation capacity and governing power.

3. Despite increased policy efforts on the part of the government, there are potentially undesirable differences between European and Caribbean Netherlands

Our analysis shows that, across the physical environment, there are potentially undesirable differences in national policy commitment between the Caribbean Netherlands and European Netherlands. Building on the aforementioned preliminary study, the following four striking examples show how the national government is devoting less policy effort to the Caribbean Netherlands than

⁶ This is a challenge faced by many Small Island Development States (UN, 2025).

to European Netherlands. These are illustrative of the size and scope of the differences in policy effort (also see Witteveen+Bos, 2024).

(1) Investment, maintenance and replacement challenges for the physical infrastructure

Previously, we pointed to a general lack of sufficient structural funding for certain island tasks and the related consequences with respect to infrastructure. In 2024, the discretionary grant for the public bodies was increased.⁷ This was a first step in correcting the skewed financial relationships (ROB, 2024). However, at the time, (a) no money was made available to catch up on accumulated backlogs; (b) no opportunity was created for public bodies to borrow money on capital markets, as is possible for European Dutch municipalities; and (c) no solution was offered for their more limited possibilities — compared to European Dutch municipalities — to activate investments within the budget (ROB, 2024; AEF, 2025). Moreover, the Mobility Fund and the Delta Fund do not apply to the Caribbean Netherlands. In European Netherlands, the national government uses these funds to finance large infrastructure projects.

The Ministry of the Interior and Kingdom Relations (BZK) commissioned consultancy firm AEF (2025) to outline the gap with respect to the funds required for investment, maintenance and replacement tasks related to the physical infrastructure⁸. The results are shown in the table below.

	2026	2050
Bonaire	USD 8–21	USD 41–43
Sint Eustatius	USD 4	USD 16
Saba	USD 3–4	USD 11

Table | The projected gap in the public bodies' budget for the described investment, maintenance and replacement tasks for the physical infrastructure in million US dollars (Source: AEF, 2025).

(2) Climate mitigation and adaptation

The Caribbean Netherlands is already severely confronted with the consequences of climate change (Ecorys, 2019). Because of its location just above sea level, parts of Bonaire face the increasing risk of more frequent flooding or even permanent inundation. While, on Sint Eustatius and Saba, the force and risk of hurricanes is substantially increasing. These islands also have to deal with major problems of erosion (Witteveen+Bos, 2024). Various studies indicate that, compared to European Netherlands, the consequences of climate change are greater in the Caribbean Netherlands (AIV, 2020).

Meanwhile, we see that the Caribbean Netherlands is lagging behind the national government in policy efforts on both mitigation and adaptation. Where policy efforts in European Netherlands are laid down in legislation (e.g., the Climate Act) and national programmes (e.g., the National Adaptation Strategy), efforts in the Caribbean Netherlands often take place on a project basis. Think of projects in the field of coral protection, combating erosion, water management, sustainability, and

⁷ The BES fund is the budgetary fund that funds Bonaire, Sint Eustatius and Saba. Part of the money is allocated in the form of discretionary grants. These are comparable to the general grants that municipalities in European Netherlands receive from the Municipal Fund. In 2024, the discretionary grant was increased by a total of EUR 8.6 million, 2.4 million of which for the maintenance of capital goods.

⁸ The following types of infrastructure were investigated: waste treatment, waste water, cultural heritage, drinking water, energy, buildings, agriculture, airports, recreation, telecommunications, water management, roads and seaports.

energy generation (e.g., see BZK, 2023e; LNV, IenW & BZK, 2020). Furthermore, various national financial regulations are also not accessible to the Caribbean Netherlands. Examples are the SDE funds, which only became available in 2022 (National Government, 2023a), and the Delta Fund, which is currently not aimed at the Caribbean Netherlands (National Government, 2023b).

Last year, it was agreed that national government and public bodies would work together to draw up climate plans. These plans focus on mitigation and adaptation (Kingdom of the Netherlands, 2024). Efforts are also underway to revise the 2016 National Climate Adaptation Strategy, which will now also include the Caribbean Netherlands. In a sense, the regions that will be hit the hardest by climate change are at the back of the queue when it comes to formulating national policy (also see Nijpels, 2023).

(3) Connectivity between islands

Up to 2021, the national government had no involvement in the organisation and management of ferry services between Sint Eustatius, Saba and Sint Maarten. Policy efforts in this area were started at the end of 2021 when a two-year pilot project was launched with a subsidy for a ferry link between the three islands (Witteveen+Bos, 2024). The subsidy period was extended once for 2024–2025, albeit at a lower amount (dossierkoninkrijksrelaties.nl, 2023). Without new government funding, the ferry service is at risk of being discontinued again after 2025.

The limited involvement of the national government in the ferry links in the Caribbean Netherlands is in stark contrast to the government's strong policy commitment to the accessibility of the various islands of European Netherlands. The government has a long-term commitment to the ferry links from Harlingen, Holwert and Lauwersoog to the West Frisian Islands. In 2011, to guarantee good and affordable ferry services, 15-year licences were issued to shipping companies (IenM, 2011). The national government also has daily dredging operations in place to keep shipping channels open. Recently, the government also set aside financial means in its Multi-Year Programme for Infrastructure, Spatial Planning and Transport, to ensure a future-proof solution to the ferry connection accessibility problem for the island of Ameland (IenW, 2024).

(4) Integration of a healthy physical environment in environmental policy

Looking at the theme of human health within environmental policy shows yet another deviating policy commitment for the Caribbean Netherlands. When the Environment and Planning Act was introduced in January 2024, the national government named a healthy environment as one of the goals that must be explicitly taken into account in the policy on the physical environment. This legal decision also entails a wide-ranging duty of care for the government towards ensuring such a healthy physical environment, which must meet a large number of environmental standards with respect to air quality, noise and the quality of both groundwater and surface water.

However, the Environment and Planning Act does not apply to the Caribbean Netherlands. Current laws and regulations for the Caribbean Netherlands do not include a similar integration of a healthy physical environment into environmental policy. For example, the BES principles of Housing, Spatial Development and Environment Act only includes a duty of care in relation to the environment (Witteveen+Bos, 2024). The Caribbean Netherlands also lacks a broad set of environmental standards for protecting human health and the environment, such as are laid down in the Decree on Environmental Quality for European Netherlands, for example.

Text box: Different outcomes despite greater policy commitment to the Caribbean Netherlands

During the advisory process, we also saw some policy areas in which the national government provides more rather than less policy support for the Caribbean Netherlands than for European Netherlands. For

example, unlike for European Netherlands, the national government has a policy to reduce the price of drinking water (BZK, 2023b). Despite this policy measure, prices have not come down to the level of that in European Netherlands. For example, after subsidies, a household in the Caribbean Netherlands pays between USD50 and USD120 per month, while for a comparable household in European Netherlands this is between EUR15 and EUR30 per month (see the Commissie Sociaal Minimum Caribisch Nederland, 2023 and Nibud, 2025). Moreover, Cabinet has also announced that, over time, it will reduce the regular subsidy on drinking water by approximately 25% (BZK, 2024d). Another example is in the field of telecommunications, where the government applies subsidies on landline connections that are not available for European Netherlands. The government has no policy commitment in the area of mobile telephony. Other choices could be made here. France, for example, has ensured that their non-European regions can make use of the relatively cheap European mobile phone plans (Witteveen+Bos, 2024). This is not the case for the Caribbean Netherlands.

4. Often, the *comply-or-explain* principle is either applied inaccurately or cannot be verified

Our analysis shows that, in public documents, accountability regarding the application of *comply or explain* is often lacking or only very brief (e.g., Witteveen+Bos, 2024). Any explanations are often limited to the statement that a different type of legal framework is involved.⁹ There is no reference to the question of whether the underlying objectives of the policy in question should perhaps be realised in a different way in the Caribbean Netherlands, in keeping with the context of the BES islands. Furthermore, we note that specific policy intensification measures for the Caribbean Netherlands do not address the question of whether they offer an alternative to European Netherlands' measures or whether there is independent policy focused on the specific tasks in the Caribbean Netherlands (e.g., Witteveen+Bos, 2024). In our opinion, this means that the *comply-or-explain* principle is not being applied accurately. Perhaps certain official documents have considered the *comply-or-explain* option, in which cases the application of the principle cannot be verified — not only for us as Council for the Environment and Infrastructure, but also and more importantly not for the public bodies.

Our analysis does not focus on the question of whether policy intensification measures for European Netherlands are either rightly applied, not applied or are amended for the Caribbean Netherlands — as these are political choices. We examined whether choices were made on the basis of careful consideration, as advocated in the explanation of the *comply-or-explain* principle (BZK, 2023a). Below, a few examples illustrate the analysis.

New legislation and regulations

Almost none of the new laws and regulations for the physical environment that have been introduced since 2019 for European Netherlands have been declared applicable to the Caribbean Netherlands (Witteveen+Bos, 2024). This applies, among other things, to the Climate Act, the Environment and Planning Act and the Nitrogen Reduction and Nature Improvement Act.

Based on the *comply-or-explain* principle, the national government should supply arguments that sufficiently substantiate the choice for an adjusted policy with regard to the Caribbean Netherlands. However, the argumentation in the explanatory notes to the aforementioned laws either consisted of only a few lines or were lacking altogether (Witteveen+Bos, 2024):

⁹ The final memorandum on the comply-or-explain principle (Eindnotitie 'Uitwerking comply or explain') states that, when current legislation explains in detail why it is either applied, not applied or has been amended, it will be sufficient to refer to this earlier argumentation in subsequent legislation. In our opinion, that should not be a reason not to reconsider, after a certain period of time, whether choices made previously still do justice to the tasks and possible changes in a particular context.

- In 2023, the Minister for Climate and Energy limited his argumentation regarding the Climate Act to the comment that this law did not apply to the Caribbean Netherlands because the BES islands are not part of the European monitoring system for greenhouse gas emissions.
- For the Environment and Planning Act, which finally came into force in 2024, the argumentation did not amount to more than the remark that various laws that would be subsumed under the Environment and Planning Act also only applied to the European Netherlands and that specific legislation continued to apply to Bonaire, Sint Eustatius and Saba and the exclusive economic zone in the Caribbean Sea.¹⁰
- In the explanatory notes to the Nitrogen Reduction and Nature Improvement Act, the Minister of Agriculture, Nature and Food Quality (LNV) did not address the decision to exclude the Caribbean Netherlands from the Act. On the one hand, it seems quite explicable that legislation on nitrogen should not apply to the Caribbean Netherlands. On the other hand, there is no substantiation as to why the Caribbean Netherlands does not need policy intensification measures and associated resources in the area of nature improvement (in line with the specific nature challenges on the three islands).

New policy plans and programmes

In almost all cases, policy documents, national programmes and incentive schemes initiated by the national government since 2019 for the physical environment of European Netherlands do not apply to the Caribbean Netherlands (Witteveen+Bos, 2024). Legislation and regulations usually include only very brief underlying arguments, and often such explanations are lacking altogether from policy plans and programmes.

Sporadically, the Caribbean Netherlands is included in national policy programmes. The National Implementation Programme for Climate Adaptation of 2023 is an example of this. In this example, the objective is emphatically different. Where the Caribbean Netherlands is concerned, the programme is limited to an outline of the related challenges and process-based measures. In addition, it also announces the need for separate agreements to be made with the public bodies (IenW, 2023).

Furthermore, regulations have occasionally been made available, after some delay, to the Caribbean Netherlands. This happened, for example, with the aforementioned Stimulation of Sustainable Energy Production and Climate Transition regulation and also with the National Growth Fund subsidy scheme of 2022 (Witteveen+Bos, 2024).¹¹

CONCLUSIONS

In the advisory report '*Elke regio telt!*' (2023), Rli together with the ROB and RVS come to the conclusion that there are large and undesirable differences between regions within European Netherlands. For the current advisory report, we have come to a similar conclusion, focusing on differences between the Caribbean Netherlands and European Netherlands. We see that, across the physical environment, there are potentially undesirable differences in policy focus between the Caribbean Netherlands on the one hand and European Netherlands on the other. And we see that these differences have contributed to the emergence or perpetuation of disadvantages for the BES islands, in recent years, with regard to public housing and infrastructure, connections between the islands, climate protection, and guarantees for a healthy human environment.

¹⁰ The initial explanatory memorandum was drawn up for the introduction of the 'comply-or-explain' principle. It took approximately five years from the introduction of the comply-or-explain principle to its final introduction in the Environment and Planning Act. The underlying arguments were not revised during this period.

¹¹ The Growth Fund was initially open to the Caribbean Netherlands, but in practice, given the minimal number of applications, it proved not sufficiently accessible to parties from the Caribbean Netherlands. This was later remedied with a specific scheme for the Caribbean Netherlands.

We appreciate the new policies that the national government in recent years has initiated in collaboration with the public bodies, as well as the efforts made by the public bodies towards improving the quality of the physical environment. However, the tasks at hand are large, while the implementation power of both the public bodies and the government is only limited. This presents a major challenge.

Finally, we note that policy intensification measures for European Netherlands have not automatically been accompanied by equivalent measures for the Caribbean Netherlands. The *comply-or-explain* principle is not being applied meticulously or verifiably. Current practice for the Caribbean Netherlands (with currently insufficient structural funding and policy intensification measures on the physical environment that are either sometimes implemented, or only in a 'light' version, but mostly not at all) offers no prospect of eliminating any undesirable differences. With this current policy practice, the government is insufficiently taking its responsibility towards the Caribbean Netherlands which is described as self-evident in the Coalition Agreement.

RECOMMENDATIONS

Based on our analysis, we present the following three recommendations:

1. Together with the public bodies, determine the ambition levels for the physical environment in 2050

The Council for Public Administration (ROB) (2024) previously argued for the national government, together with public bodies, to determine the ambition levels and goals to be realised for various policy tasks. The ROB established that, at this time, there is only general agreement about what tasks should be tackled and by whom; the desired level of ambition and the associated budget have not been documented anywhere¹² — but they should be. The ROB focuses primarily on 2030. We urge the government to take the initiative to start this fundamental discussion about ambition levels.

We would like to emphasise that, for the physical environment, a 2030 horizon is not far enough into the future when it comes to formulating ambitions and goals. As the State committee on demographic developments in Caribbean Netherlands 2050 has also indicated, we must already be thinking about the challenges that will need to be faced by 2050. Therefore, we endorse the decision made by the Ministry of the Interior and Kingdom Relations to set the time horizon on 2050 with respect to research into the financial task of replacing, investing in and maintaining the physical infrastructure on Bonaire, Sint Eustatius and Saba (AEF, 2025). This provides an important building block for determining the desired level of ambition for the physical environment on each island. This level of ambition, per island, must address both the priorities in tackling deficits and the execution of regular tasks. Each island must address its specific challenges, such as the hurricane risk on Saba and Sint Eustatius and the flood risks on Bonaire.

It is important that citizens and businesses from the three islands are also involved in determining these ambition levels. This ties in with the earlier message from the advisory report '*Elke regio telt!*' (i.e. every region counts) (Rli, ROB and RVS, 2023) that things should not only be considered from a perspective of 'national statistics' and 'The Hague', but also by looking at the region's local experiences and perceptions. In the further elaboration of '*Elke regio telt!*', the Cabinet has recognised that national standards, based on averages and large numbers in combination with

¹² In European Netherlands, the distribution criteria for the municipal fund provide guidance in determining the discretionary grant per municipality, while there are no widely supported references for the BES fund.

short-term financing and accountability, do not always match the context and characteristics of the various regions (BZK, 2024b). This applies to regions within European Netherlands, but even more so to the Caribbean Netherlands.

The joint process for determining the ambition levels for each island will reveal that certain differences are considered desirable by all parties. The important thing is that the differences are assessed on the basis of equality between the levels of government and with the involvement of residents and businesses. This approach explicitly builds on the working method chosen for the climate tables for the Caribbean Netherlands.

We furthermore do realise that all of the undesired differences cannot be eliminated at once, given the limited implementation capacity of both the national government and the public bodies. In this regard, it is important to make agreements about joint priorities. We can imagine that the joint determination of ambition levels will also give rise to an evaluation and possible revision of the agreements of 10-10-10.

2. Strengthen the implementation power by improving the financial position of the public bodies and start a long-term cooperation programme between the national government and the public bodies

A joint agenda will have no effect if there is no administrative will among all parties involved to carry it out. However, implementation power cannot be taken for granted. As has also emerged from previous studies and advisory reports, increasing the implementation capacity and financial position of the public bodies are key aspects of implementation power (IdeeVersa, 2023; ROB, 2024; AEF, 2025). From a financial perspective, this is primarily about increasing the structural financial manoeuvrability to suit the structural tasks of the public bodies. And it is about increasing the borrowing capacity and the possibilities to activate investments. Both following the example of what is the current practice among European Netherlands' municipalities. It is important to realise that the possibilities for increasing implementation capacity are not unlimited, given the relatively small labour force. To strengthen this capacity on the islands, opportunities for regional cooperation and cooperation with parties in European Netherlands must also be considered. There are already a few examples of this, such as the involvement of the Dutch housing corporation 'Bazalt Wonen' in social housing on Saba and the support of VNG International on specific policy dossiers. Finally, it is important that employees are enabled to carry out their work. This includes, for example, bringing the land registry data up to date. When determining the joint level of ambition (see Recommendation 1), the necessary and achievable implementation capacity, knowledge position and financial resources must be determined.

More resources and more capacity are a precondition, but in themselves are not sufficient to increase implementation power. As mentioned above, it also requires administrative willingness to act, as well as mutual trust. The formal division of roles and tasks should not be a strictly enforced boundary, but rather a starting point from which all parties do what is necessary to achieve the stated level of ambition.

The accumulated backlogs and unique challenges in the Caribbean Netherlands also require additional commitment and investment from the national government. In our opinion, setting ambition levels should therefore also be the starting point for national government investments in a long-term and substantial cooperation programme between the national government and the public bodies for the development of the Caribbean Netherlands. This could take the form of an agenda of opportunities for broad prosperity, as we have advocated together with the ROB and RVS in the advisory report '*Elke regio telt!*' (2023), for the regions in the European Netherlands that are dealing

with unjustifiable differences. In addition, it would be logical to link up with the National Programme on dynamic regions that was recently announced by the Schoof Cabinet (BZK, 2024b).¹³

We can imagine that during the cooperation programme the national government, in agreement with the public bodies, would be responsible for tasks that clearly transcend the scale of the municipalities in European Netherlands (e.g., via the National Office for the Caribbean Netherlands)¹⁴. This concerns tasks which, in European Netherlands, are allocated to either regional, provincial or national government level. This could include, for example, some or all of the responsibility for sea ports and airports, a few crucial connections on and between the islands or some or all of the tasks in the area of waste management and processing. Consideration should also be given to forms of 'twinning' or 'servicing' whereby organisations in European Netherlands take on these tasks together with or on behalf of public bodies. Examples include regions in European Netherlands, water boards or environmental services. In addition, it is also important to consider possible collaborations with organisations from the Caribbean region (both within and outside the Kingdom of the Netherlands).

The public bodies and the national government should enter into — and honour — agreements on these aspects with respect for the constitutional reforms of 10–10–10 and on the basis of equality.

The process of determining the ambition levels also requires commitment of the public bodies (see Recommendation 1). We propose that the government will bear the costs of determining the ambition level and enable the public bodies to deploy the necessary capacity for this purpose. By continuing to build on insights and outcomes from ongoing processes, duplication of work is avoided (e.g., the Spatial Development Plan on which Saba is working).

3. Apply the comply-or-explain principle in a consistent manner and at the start of the policy cycle

Our analysis shows that the *comply-or-explain* principle is currently often either not applied accurately or cannot be verified. In order to prevent new backlogs, it is necessary to apply the principle consistently from now on and at the start of the policy cycle, in addition to the previously advocated establishment of ambition levels as a basis for new agreements on financial relationships and a long-term and substantial programme for the Caribbean Netherlands.

As indicated earlier, the essence of the *comply-or-explain* principle is that a careful assessment must be made of whether policy intensification measures should be implemented, and, if so, how this should be done. In our opinion, it is important that this assessment be made in a manner that is both transparent and verifiable. We therefore recommend that the national government provides a concise overview at a few set times each year, indicating (a) which processes it has initiated on policy intensifications, (b) how these relate to the administrative ambitions to be agreed upon (see Recommendation 1), and (c) how it intends to apply the *comply-or-explain* principle for each initiative.

We realise that, from the perspective of the Caribbean Netherlands, it is not always desirable or feasible to actively participate in all of the national government's policy preparations for the physical environment. This would simply require too much effort from the side of the public bodies as well as from local residents and businesses. With the brief overview that we propose, the commitment that is required from the Caribbean Netherlands could be kept to a minimum.

¹³ Inspiration can also be drawn from other area-specific national programmes, such as the National Programme for Rotterdam South.

¹⁴ The National Office for the Caribbean Netherlands provides this central support for all ministries operating on the three islands. This includes formal employment practices and operational management, such as facilities, accommodation, IT, human resources and training.

Using this overview at the start of the policy cycle for each policy intensification measure will show explicitly whether and, if so, how the policy measure in question will apply *appropriately* and *equally* to the Caribbean Netherlands. This would prevent having to conclude, a few years down the line, that once again the *comply-or-explain* principle has been applied neither meticulously nor verifiably.

The public bodies should be given the opportunity to opt-in. This refers specifically to a request by the public bodies for a policy intensification measure, such as a subsidy scheme or an incentive programme, that the national government intends to apply only to European Netherlands also to apply to the Caribbean Netherlands. The basic principle here should be that the national government grants this request and carries the related costs. Such an opt-in request could only be rejected with good reason and following a discussion with the public bodies and parliament.

IN CLOSING

The title of this advisory report is 'Working together to do better'. This emphasises that the national government and public bodies can only successfully implement the recommendations by working together. Here, the involvement of citizens and entrepreneurs is also essential.

We hope that our advice will encourage you to implement the Cabinet's responsibility towards Bonaire, Sint Eustatius and Saba, in practice, as fully fledged regions of the Netherlands, as described unambiguously by the Cabinet. And, thus, to ensure the same level of quality of the physical environment for ALL the Dutch regions.

The wish recently announced by the cabinet to develop an integrated approach and, in conjunction with this, stronger coordination of government policy, provides a good starting point, in this respect. (BZK, 2025).

We also hope that public authorities will energetically take up the recommendations set out in our advice to improve the quality of the physical environment and strengthen the administrative capacity needed to achieve this goal. Only in this way will it be possible to achieve better results together.

Yours sincerely,
Council for the Environment and Infrastructure,



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The Council for the Environment and Infrastructure (Rli) is a strategic advisory body for the National government and Parliament in matters of sustainable development for the physical environment and infrastructure. The Council operates independently and provides both solicited and unsolicited advice on long-term policy issues. With an integral approach and advice on strategic level, the Council is aimed to contribute to more comprehensive and broad political and social debate as well as to the quality of decision-making.

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