



**Written submission to the country report
on the Kingdom of the Netherlands of the
UN Special Rapporteur on Contemporary
Forms of Racism, Racial Discrimination,
Xenophobia and Related Intolerance**

February 2020

This document is submitted by the Nederlands Juristen Comité voor de Mensenrechten/ the Dutch section of the International Commission of Jurists (hereinafter ‘NJCM’). The NJCM is a volunteer organisation consisting of more than 1000 members, primarily lawyers, legal professionals and law students. The NJCM monitors the protection of human rights in the Kingdom of the Netherlands with a dominant focus on the European Netherlands. The organisation responds accordingly by commenting on legislative proposals and governmental policies, organising seminars and writing alternatives reports to international human rights mechanisms.

In October 2019, the director of NJCM, and several other civil society organisations, had the opportunity to meet the UN Special Rapporteur on Contemporary Forms of Racism, Racial Discrimination, Xenophobia and Related Intolerance (hereinafter ‘Special Rapporteur’) in the Netherlands. This fruitful meeting included discussions about human rights issues on discrimination, racism and intolerance in the Kingdom. After this visit the Special Rapporteur published her preliminary findings in a press release, which included a call to civil society to submit additional written documents. The NJCM submits this document, written by volunteers of the organisation, in reaction to this call.

Given the already comprehensive preliminary findings of the Special Rapporteur, this submission focuses on two issues. Part I discusses how differences in the legal framework of the Kingdom result in racial inequality in the Caribbean Netherlands. Part II addresses the implementation of a new policy framework on traveller camps in the Netherlands.

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I. Racial Inequality in the Caribbean Netherlands

Introduction

This section will discuss two topics in relation to the Dutch Caribbean.¹ Firstly, it will explain how the legislature's differentiation between the European Netherlands and the Caribbean Netherlands leads to social inequality and indirectly, led to racial inequality. Secondly, this section will explain how the Principle of Equal Treatment is undermined by attempts that have been made in the Constitution of the Netherlands (hereinafter 'Dutch Constitution') and by some political parties and local municipalities, to differentiate between citizens of the European Netherlands and the Caribbean Netherlands.

Background

The Dutch Caribbean has been a part of the Kingdom of the Netherlands since 1954 after the enactment of the Charter for the Kingdom of the Netherlands (hereinafter 'Charter').² Colonial rule preceded this orientation in which the Dutch engaged in the Atlantic slave trade and facilitated the migration of indentured workers from places such as India and Indonesia. As a consequence, the populations of the Dutch Caribbean consist of different ethnic groups, including people of African, Carib Amerindian and East Asian descent.³

The Constitutional Framework

The Kingdom of the Netherlands is constituted by the Charter and the Dutch Constitution.⁴ The Kingdom consists of four countries, Aruba, Curaçao, St Maarten and the Netherlands, each of which has its own constitution, government and parliament. Bonaire, Saba and Sint Eustatius (hereinafter 'BES islands') are also islands located in the Caribbean and became the so-called special municipalities of the Netherlands in 2010.⁵ Therefore, the BES islands fall within the constitutional framework of the Netherlands.

Democratic deficit

The constitutional framework of the Kingdom creates a distinction between Kingdom matters⁶ and autonomous matters.⁷ Kingdom matters are governed by Kingdom institutions and autonomous matters are governed by the four countries respectively. Under certain circumstances, Kingdom institutions can also interfere in autonomous matters.⁸ However, this capacity to interfere constitutes a lopsided attribution of power by the Netherlands, as the Caribbean islands can always be overruled by the government of the Netherlands. Therefore, it can be said that Kingdom interference in the autonomous matters of the Caribbean countries

¹ In this section the terms Caribbean Netherlands or Dutch Caribbean are used to mean those parts of the Dutch Kingdom situated in the Caribbean meaning the islands: Aruba, Bonaire, Curaçao, Saba, St. Eustatius, St. Maarten and not merely those islands which are special municipalities of European Netherlands (Bonaire, Saba and St. Eustatius).

² Charter of the Kingdom of the Netherlands, 1 November 2010 (English version available at: <https://bit.ly/36Er0LM>).

³ National Statistical Office (CBS) *Population Caribbean Netherlands stable*, 21 July 2016 (available at: <https://www.cbs.nl/en-gb/news/2016/29/population-caribbean-netherlands-stable>).

⁴ Charter of the Kingdom of the Netherlands (n 2) art 1; The Constitution of the Kingdom of the Netherlands 2008 (English version available at: <https://www.government.nl/documents/regulations/2012/10/18/the-constitution-of-the-kingdom-of-the-netherlands-2008>).

⁵ Act BES Admission and Expulsion BES, 2010.

⁶ See Charter of the Kingdom of The Netherlands (n 2), most notably article 3 and article 43.

⁷ Charter of the Kingdom of The Netherlands (n 2) art 41.

⁸ E.g. if the realisation of fundamental human rights and freedoms, legal certainty and good governance are in danger; Charter of the Kingdom of the Netherlands (n 2) art 43.

are interference by the Netherlands (there is no such thing as Kingdom interference in autonomous matters of the Netherlands).

This lopsided distribution of power expresses itself in the following way. The Kingdom government is composed of the ministers of the Netherlands and a minister plenipotentiary for each of the Caribbean countries.⁹ The constitutional framework enables the ministers of the Netherlands to overrule the ministers plenipotentiary of Aruba, Curaçao and St Maarten.¹⁰ Moreover, due to the fact that there is no Kingdom parliament, the Dutch parliament acts as the Kingdom parliament without the other countries having a right to vote.¹¹ Scholars have called this the *democratic deficit*¹² or colonialism.¹³ This imbalance continues to exist despite attempts to eliminate it, such as the initiative to create an independent dispute (*geschillenregeling*).¹⁴

Whether called a democratic deficit or colonialism, it is clear that the current imbalance within the constitutional framework is a legacy of inferiority deriving from our colonial history.¹⁵ Although individuals do not always act according to these discourses in daily life, racialized discourses on national identity persists, often classifying ‘original’ Dutch Caribbean populations as distinct peoples.¹⁶ The historically grown constitutional imbalance is therefore susceptible to maintain racialized discourses and practices.

The Dutch government should be more aware of the fact that the Dutch Caribbean communities have a right to be included in decision-making processes, which directly affect them in accordance with internationally established democratic values, and voting and representational rights. The government should increase its efforts to ensure a meaningful participation and representation of all communities in all government fora.

Differentiation between Dutch citizens within the Kingdom of the Netherlands

According to article 1 of the Dutch Constitution, citizens under similar circumstances should be treated equally. However, the Dutch Constitution grants the Dutch legislature discretion to differentiate between the BES islands and The European Netherlands when the size of the islands, geographical circumstances, climate or other factors permit.¹⁷ The legislature uses this discretion to justify unequal rights to social welfare,¹⁸ which has led to (social) disparities between the BES islands and the European Netherlands.¹⁹ Such disparities have, especially

⁹ Charter of The Kingdom of the Netherlands (n 2) art. 7.

¹⁰ Charter of The Kingdom of the Netherlands (n 2) art. 12.

¹¹ Charter of The Kingdom of the Netherlands (n 2) arts 15-19.

¹² For example see: Arjen van Rijn, *Handboek Caribisch Staatsrecht*, 2019, [Handbook Caribbean Constitutional Law] The Hague: Boom juridisch p. 158-159.

¹³ Rygond Santos do Nascimento (dissertation), *Het Koninkrijk Onstluierd*, 2016, [The Kingdom Unveiled] Apeldoorn: Maklu publishers.

¹⁴ Aruba, St Maarten and Curacao have been in negotiations with the Netherlands about establishing an independent organ, which can settle disputes within the Kingdom.

¹⁵ See e.g. Da Costa Gomez who primarily argued for voting rights for Caribbean Dutch citizens for the Dutch parliament, which was in 1935 still explicitly the legislator of all the territories within the Kingdom; Moises Frumencio da Costa Gómez (dissertation), *Het wetgevend orgaan van Curaçao. Samenstelling en bevoegdheid bezien in het kader van de Nederlandsche koloniale politiek*, 1935, [The legislative body of Curaçao. Composition and competence viewed in the context of Dutch colonial politics] Amsterdam: H.J. Paris.

¹⁶ For national identities in Curaçao, see for example: Rose Mary Allen and Francio Guadeloupe, *Yu di Kòrsou, A Matter of Negotiation: An Anthropological Exploration of the Identity Work of Afro-Curaçaoans*, 2016 in J.W. Duyvendak et al. (eds.), *The Culturalization of Citizenship* (available at: DOI 10.1057/978-1-137-53410-1_7).

¹⁷ The Constitution of the Netherlands, art. 132a.

¹⁸ This for instance concerns the amount of benefits, minimum wage and pension.

¹⁹ Netherlands Institute for Human Rights, *Naar een mensenrechtelijk aanvaardbaar voorzieningsniveau voor Caribisch Nederland*, 2016, [Towards an acceptable level of human rights in the Caribbean Netherlands] (available at: <https://mensenrechten.nl/nl/publicatie/5b46fcee748c2212a545183c>); Commissie Evaluatie uitwerking van de nieuwe staatkundige structuur

affected residents of these islands who, because of enduring racism, are often thought to be essentially distinct peoples from Dutch Europeans. Larger populations of the BES islands believe that they live under worse economic and political circumstances compared to the citizens of the European Netherlands and compared with the situation before 2010, which is partly due to the introduction of the dollar in 2011.²⁰

In addition, within the European territory of the Kingdom, the Dutch legislature and local governments differentiate between Dutch citizens born in the European Netherlands on the one hand, and those born in or migrating from the Dutch Caribbean. The following two examples illustrate this differential treatment.

First, in 2012, a bill was proposed (Bosman-wet) to regulate the migration of citizens from the Dutch Caribbean. It required those citizens migrating to the European Netherlands to meet an additional set of requirements, such as not posing a threat to public order or public interest and possessing a basic qualification competent in the Dutch labour market. These requirements do not apply to citizens from the European Netherlands who want to migrate to the Dutch Caribbean.²¹ The bill, was one of several,²² prompted discussions inside and outside parliament about discrimination, racism and citizenship. In October 2016, the parliament rejected the bills.²³

Second, in December 2018 the Council of Leeuwarden²⁴ presented its safety policy for 2019-2023 (Veiligheidsagenda 2019-2023), which aims to address challenges for the quality of life in the city. This policy includes a paragraph explaining its plan to discourage ‘hopeless’²⁵ or underprivileged people of Dutch Caribbean background from moving to Leeuwarden from Rotterdam or from the Dutch Caribbean islands.²⁶ After engagements with NGOs representing Dutch Caribbean populations, the Council removed this paragraph from its policy. In 2019, the Council also committed itself to developing policies that would improve the social position of Dutch Caribbean populations in Leeuwarden.²⁷

It is important that the Dutch government will fully implements article 1 of the Dutch Constitution and treats Dutch citizens equally, regardless of Caribbean heritage. The Dutch government should also make greater efforts to respect its responsibilities in relation to the economic, social and cultural rights of the populations within the Dutch Caribbean.

Caribisch Nederland, *Vijf jaar verbonden: Bonaire, Sint Eustatius, Saba en Europees Nederland*, 2015 [Commission Evaluation on the new constitutional structure in the Caribbean Netherlands, Five years connected: Bonaire, Sint Eustatius, Saba and European Netherlands] (available at: <https://kennisopenbaarbestuur.nl/media/210276/Rapport-Evaluatiecommissie-Caribisch-Nederland-Vijf-jaar-verbonden.pdf>).

²⁰ Netherlands Human Rights Institution, *Naar een mensenrechtelijk aanvaardbaar voorzieningenniveau voor Caribisch Nederland* (n 19) p 15.

²¹ Proposal by Member of Parliament Bosman for the regulation of the establishment of Dutch nationals from Aruba, Curaçao and St Maarten in the Netherlands, 3 July 2012 (available at: https://www.eerstekamer.nl/wetsvoorstel/33325_initiatiefvoorstel_bosman).

²² Asela van Zonneveld (Bachelor Thesis), *Open Grenzen binnen het Koninkrijk* 2015 [Open borders within the Kingdom].

²³ In 2018 the parliament also voted against a law, which would send Dutch Caribbean people to their island of heritage if convicted of a crime. See: Proposal by Members of Parliament Fritsma and De Graaf on the Return of Criminal Antilleans, 1 October 2014 (available at: https://www.eerstekamer.nl/wetsvoorstel/34044_initiatiefvoorstel_fritsma).

²⁴ Leeuwarden is a city up north in the Netherlands with a population of 122,293.

²⁵ Dutch word used: kansloos.

²⁶ Stef Altena, *Leeuwarden wil komst van meer Antillianen voorkomen*, 20 December 2018 [Leeuwarden wants to prevent the arrival of more Antilleans] (available at: <https://www.lc.nl/friesland/Leeuwarden-wil-komst-van-meer-Antillianen-voorkomen-23971596.html>).

²⁷ Guilliano Payne, *Comité in Leeuwarden dient plan in om positie Caribische Nederlanders te verbeteren*, 2 December 2019 [Committee in Leeuwarden submits plan to improve position of Dutch Caribbean] (available at: <https://caribischnetwerk.ntr.nl/2019/12/02/comite-in-leeuwarden-dient-plan-in-om-positie-caribische-nederlanders-te-verbeteren/>).

Conclusion

The relationship between the European Netherlands and the Caribbean Netherlands is complicated, looking at the constitutional framework and the historical background. This is, in part, due to the imbalance of power within the Kingdom of the Netherlands. In order to eliminate, the resulting racial discrimination and inequality, the Kingdom should review its constitutional framework in order to sure that decision-making processes are inclusive and to ensure that no distinctions are made between Dutch citizens based on their Caribbean heritage.

II. Roma, Sinti and Travellers in the Netherlands

Introduction

On 12 July 2018, the Dutch government introduced a new policy framework regarding traveller²⁸ camps in the Netherlands.²⁹ This policy framework was adopted after various national and international organisations and institutions had criticised the former policy for many years.³⁰ The criticism was primarily directed at the infamous ‘phase-out policy’ of traveller camps, also known as the ‘extinction policy’ (*uitsterfbeleid*). This policy aimed to abolish traveller camps, either by offering regular housing or by dismantling caravan plots once the previous residents had left.³¹ The new policy framework overturned the ‘extinction policy’ and aims to ‘provide protection of travellers against discrimination, safeguard their human rights and offer legal certainty and clarity in relation to their housing situation’.³² Indeed, the policy framework recognises the rights of travellers in the Netherlands and sets out the fundamental rights standards for local traveller camp policies.³³ However, political and legal change on paper does not necessarily lead to change in practice.

Background

In the Netherlands, housing policies, including traveller camps policies, are decentralised. Local authorities, such as municipalities and housing corporations, are primarily responsible for

²⁸ In the Netherlands, *woonwagengewoners* is often used as an umbrella term to refer to Roma, Sinti and travellers who live or would like to live in caravans on traveller camps as part of their cultural identity and tradition. For the sake of brevity, it is chosen to use the English term ‘travellers’ when is referred to the Dutch notion of *woonwagengewoners*.

²⁹ Ministry of the Interior and Kingdom Relations, *Beleidskader gemeentelijk woonwagen- en standplaatsenbeleid*, July 2018, [Policy Framework – Municipal Caravan and Pitch Policy] (available at: <https://www.rijksoverheid.nl/documenten/rapporten/2018/07/02/beleidskader-gemeentelijk-woonwagen-en-standplaatsenbeleid>).

³⁰ For international criticism see e.g.: ECRI 2013, Report on the Netherlands (Fourth Monitoring Cycle), CRI(2013)39; UN CERD 2015, Concluding observations on the nineteenth to twenty-first periodic reports of the Netherlands, CERD/C/NLD/CO/19-21. For national criticism see e.g.: National Ombudsman 2017, *Woonwagengewoner zoekt standplaats: een onderzoek naar de betrouwbaarheid van de overheid voor woonwagengewoners* [Travellers in search of caravan plots: research into the reliability of the government for travellers], report no. 2017/060; various decisions of the Netherlands Institute for Human Rights, for example, 1 May 2017, no. 2017-55 (Central Government). For an overview see also: Huijbers, L.M. and Loven, C.M.S., *Pushing for political and legal change: protecting the cultural identity of travellers in the Netherlands*, 2019, Journal of Human Rights Practice.

³¹ The phase-out policy was not developed by local authorities themselves, but was proposed as a policy option by the Dutch central government in the Guide to Municipalities of 2006 (VROM (former Ministry of Public Housing, Spatial Planning, Environment and Infrastructure), *Werken aan woonwagenlocaties, Handreiking voor gemeenten: over beleid en handhaven*, 2006, [Working on traveler camps, guide to municipalities: concerning policy and enforcement].

³² Policy Framework (n 29), p. 7.

³³ For a positive reception of the policy framework see e.g.: NRC Handelsblad, *Minister: eind aan uitsterfbeleid woonwagens* 12 July 2018 [Minister says: end of the phasing out of traveller camps] (available at: <https://www.nrc.nl/nieuws/2018/07/12/minister-eind-aan-uitsterfbeleid-woonwagens-a1609773>); Het Wiel, *Ministerie van BZK presenteert nieuw beleidskader voor gemeentelijk woonwagenbeleid*, 12 July 2018 [Ministry presents new policy framework] (available at: <https://www.hetwiel.info/ministerie-van-bzk-presenteert-nieuw-beleidskader-voor-gemeentelijk-woonwagenbeleid/>); Public Interest Litigation Project, *Regering presenteert nieuw beleidskader voor woonwagen en standplaatsenbeleid* 2018 [Government presents new policy framework] (available at: <https://pilpnlcm.nl/regering-presenteert-nieuw-beleidskader-voor-woonwagen-en-standplaatsenbeleid/>); For a human rights analysis of the policy framework see also Loven, C.M.S. and Huijbers, L.M., *Woonwagencultuur mag toch blijven: Nederlandse overheid neemt officieel afscheid van het uitsterfbeleid* [Travellers’ culture allowed to stay: central government officially ends phasing out policy for traveller camps], *NJB* 2018 (93:38), p. 2888-2892.

housing. Consequently, the main issue is to what extent the new framework is actually implemented by the Dutch municipalities, since each of them is responsible for their own policy for traveller camps. This section explained that less than two years after the publication of the new policy framework, a mixed picture arises. Although several municipalities have implemented, or are in the process of implementing the new policy framework, there are signs indicating that there remains a long way to go before travellers' rights are fully protected throughout the Netherlands. However, it is necessary to consider that the Netherlands is in a transitional phase. Therefore, as there are no statistics available on how adequately municipalities have implemented the new policy framework, it is difficult to draw general conclusions.

Good practices

The Ministry of the Interior and Kingdom Relations has asked Platform31, an independent knowledge and network organisation, to set up a 'knowledge- and learning program' to help municipalities implement the policy framework.³⁴ As part of this program, Platform31 has organised Community of Practice meetings with municipalities. According to Platform31, some municipalities have taken important steps in implementing the policy framework by making an inventory of the demand for caravan plots, by involving travellers in the decision-making process, and/or by exploring the possibilities for increasing the amount of caravan plots. This inventory is important in order to ensure that the housing policy is adequate and that travellers have a genuine opportunity to live in caravans on traveller camps. A good example, in this regard, is the municipality of Arnhem, as representatives of the local travellers' community were able to provide input for a new housing vision and as the municipality decided to make an inventory of the demand for caravan plots.³⁵ While some municipalities have taken positive steps, Platform31 indicates that there are still a lot of municipalities that have not begun to implement the framework.³⁶

Reasons for concern

The National Ombudsman was one of the national institutions that had criticised the Dutch traveller camps policy. In a critical report in 2017, the Ombudsman concluded that the government failed to safeguard travellers' cultural rights and recommended that municipalities align their traveller camps policy with human rights standards.³⁷ Based on follow-up research in 2018, the Ombudsman concluded that not all municipalities were willing to implement his recommendations and found that some municipalities had inadequate, or even incorrect, knowledge of the relevant human rights standards.³⁸

³⁴ This program will run from 1 February 2019 to 30 June 2020.

³⁵ Platform31, *Omdenken en doen: gemeenten gaan voor mensenrechten-proof woonwagenbeleid*, 9 January 2020 [Municipalities aiming for a fundamental rights proof traveller camps policy] (available at: <https://www.platform31.nl/nieuws/omdenken-en-doen-gemeenten-gaan-voor-mensenrechten-proof-woonwagenbeleid>).

³⁶ Platform31 2020 (n 33).

³⁷ National Ombudsman 2017 (n 30).

³⁸ National Ombudsman, *Opvolging van de aanbevelingen uit het rapport Woonwagewoner zoekt standplaats*, 23 April 2018 [Letter to the Minister of the Interior and Kingdom Relations: follow-up on the Report] (available at: <https://www.nationaleombudsman.nl/system/files/bijlage/Brief%20aan%20minister%20BZK%20inzake%20opvolging%20aanbevelingen%20standplaatsenbeleid%20woonwagens%2023%20april%202018.pdf>).

Three months after the promulgation of the policy framework, three regional mayors, who represent 108 out of the 355 Dutch municipalities,³⁹ sent a responsive letter to the Minister of the Interior and Kingdom Relations.⁴⁰ This letter gave reason for concern, as the mayors expressed their doubts regarding the implementation of the policy framework. More specifically, they argued that the policy framework was difficult to implement, because it posed a barrier to combating crime. The link between the policy framework and the alleged criminal behaviour of travellers gave our organisation, the NJCM, reason to publish a statement in response, in which it expressed the concern that the regional mayors seemed to consider all travellers as criminal and to imply that the travellers' culture should be respected less because criminal behaviour exists within the community. Moreover, the NJCM has encouraged the central government to clarify to local governments that they must treat the housing of travellers and the combating of crime separately.⁴¹

The Minister has also responded to the mayors' letter, in a general letter to all municipalities, in which she ultimately reinforces the NJCM's recommendation. She stressed that the policy framework is only about the human rights of travellers in relation to housing and should therefore be treated as a separate issue from that of municipalities' task to combat crime. Nevertheless, this statement was weakened when the Minister acknowledged the concerns of the regional mayors' concerns by reasoning that a balance should be found between protecting the travellers' human rights and effectively combating crime.⁴²

Most recently, on 2 December 2019, the Netherlands Institute for Human Rights (hereinafter 'NIHR') found that the municipality of Nijmegen discriminated against travellers by carrying out a housing policy that did not provide for a comparable supply of caravan plots and social housing (as far as possible).⁴³ Despite a serious shortage of caravan plots, the municipality had refused to increase the number of caravan plots. The NIHR also found that the municipality did not consider the new policy framework as reason to change its traveller camps policy.

Conclusion

The aforementioned demonstrates that although several municipalities have implemented, or are in the process of implementing, the human rights proof policy framework, there is still a long way to go before travellers' rights are fully protected throughout the Netherlands. Therefore, it is important that the municipalities' implementation of the policy framework is carefully monitored and evaluated by the central government to ensure that travellers have a

³⁹ The mayors of the southern provinces Limburg, Zeeland-West-Brabant, Oost-Brabant; Regional Mayors, *Regions* (available at: <https://www.regioburgemeesters.nl/regio-s/>).

⁴⁰ Regional mayors of the southern provinces, *Landelijk beleidskader gemeentelijk woonwagen- en standplaatsenbeleid*, 17 October 2018, [Letter to the Minister of the Interior and Kingdom Relations: response to new policy framework] (available at: <https://woonwagenwijzer.nl/download/Brief-gemeente-Eindhoven-aan-Ministerie-van-BZK-over-gemeentelijk-woonwagen-en-standplaatsenbeleid-17-oktober-2018.pdf>).

⁴¹ Response of the Dutch Section of the International Commission of Jurists (NJCM) to the letter, *Burgemeesters: werk stigmatisering woonwagenbewoners niet in de hand*, 13 December 2018 [Mayors: do not encourage the stigmatization of travellers] (available at: <https://njcm.nl/actueel/persbericht-njcm-burgemeesters-werk-stigmatisering-woonwagenbewoners-niet-in-de-hand/>).

⁴² Letter of the Minister of the Interior and Kingdom Relations, *Toelichting op het Beleidskader gemeentelijk woonwagen- en standplaatsenbeleid*, 18 December 2018 p.4. [Explanation of the policy framework] (available at: https://www.tweedekamer.nl/kamerstukken/brieven_regering/detail?id=2018Z24162&did=2018D60561).

⁴³ Netherlands Institute for Human Rights 2 December 2019, no. 2019-126 (Municipality of Nijmegen discriminates against travellers). The NIHR renders non-legally binding, yet authoritative, decisions on the compatibility of governmental authorities with the Equal Treatment Act. Until the new policy framework, it had delivered 37 decisions relating to traveller camps policy, and in 21 of them it found that there had been a violation (see Huijbers and Loven 2019 (n 30), p. 8).

genuine opportunity to live in a caravan camp. A first step in this regard was a baseline measurement in 2018, showing that there are 7.723 traveller camps spread across 262 municipalities.⁴⁴ The central government has agreed to, periodically, monitor the development of caravan plots throughout the Netherlands.⁴⁵

⁴⁴ Companen, *Travellercamps in the Netherlands, as of January 2018*, 10 October 2018 (commissioned by the government).

⁴⁵ Letter of the Minister of the Interior and Kingdom Relations, *Aanbieding beleidskader voor gemeentelijk standplaatsenbeleid* 18 December 2018, p. 2. [Presentation of the new policy framework] (available at: <https://www.rijksoverheid.nl/documenten/kamerstukken/2018/07/12/aanbiedingsbrief-bij-het-rapport-'-beleidskader-voor-gemeentelijk-standplaatsenbeleid'-en-het-'advies-inzake-woonwagen-en-standplaatsenbeleid'>).