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Onderwerp: Reactie op uw brief van 3 oktober over de biomassacentrale van Veolia in Arnhem.

Datum: 14 oktober 2019, Arnhem

Geachte Provinciale en Gedeputeerde Statenleden en Commissaris van de Koning,

Hartelijk dank voor [uw reactie van 3 oktober](#) met als onderwerp de 'biomassacentrale van Veolia Arnhem'. Dit was een reactie op [onze brief van 10 september](#) waarin wij u aansprakelijk stellen voor schade aan onze gezondheid, de natuur, het klimaat en onze toekomst en die van onze kinderen en waarin we u te kennen hebben gegeven een aanklacht te zullen indienen bij het [Internationaal Strafhof in Den Haag](#) indien de centrale in productie genomen zal worden.

We zijn de afgelopen weken druk bezig geweest om in kaart te brengen welke lobbybedrijven invloed uitoefenen op de politiek in Nederland om de biomassacentrales er doorheen te drukken, ondanks de honderden rapporten waaruit blijkt dat het verbranden van houtige biomassa funest is voor onze gezondheid, de natuur, ons klimaat en daarmee onze toekomst. We hebben medewerkers van meer dan 70 betrokken organisaties onderzocht en daar is een heel duidelijk beeld uitgekomen. Er worden jaarlijks miljoenen euro's uitgegeven door een aantal energiebedrijven (o.a. door Veolia) om het verbranden van houtige biomassa in Nederland mogelijk te maken door middel van lobbypraktijken. Het betreft o.a. ook diezelfde energiemaatschappijen die destijds betrokken waren bij de lobby om de kolencentrales open te houden en zelfs drie nieuwe kolencentrales bij te laten bouwen terwijl op datzelfde moment al bekend was dat de energie die we daarmee zouden opwekken duurder zou zijn voor de Nederlandse bevolking dan de groene stroom die we konden importeren uit Duitsland. De desbetreffende kolencentrales hebben jarenlang aantoonbaar door meerdere officiële rapporten een aanzienlijke piek in CO₂-uitstoot gegenereerd en sinds de overstap van het verbranden van houtige biomassa is die CO₂-uitstoot nog eens verergerd. Uit ons onderzoek blijkt heel duidelijk dat een handjevol Nederlandse wetenschappers betrokken is bij die lobbypraktijken en dat de ministeries RVO en de PBL samenwerken met de desbetreffende wetenschappers en de energie- en lobbymaatschappijen om dit schadelijke beleid er zowel landelijk als op Europees niveau doorheen te drukken. Het merendeel van de bestuursleden van de organisaties die de biomassacertificeringen verzorgen, hebben ofwel directe of indirecte financiële belangen in houtige biomassa of zitten in de eerste ring van de lobbymaatschappijen. Gedeputeerde Statenlid Jan van der Meer zit ook in de eerste ring van betrokken personen met betrekking tot ons pro-biomassalobbyonderzoek. Eind deze week zullen we onze bevindingen opleveren aan [Follow The Money](#) zodat een onafhankelijke partij onze onderzoeksresultaten kan nalopen, aanvullen en publiceren. Het was voor ons een schok om te moeten concluderen dat de afgelopen jaren meerdere brieven aan de politiek zijn verzonden door duizenden wetenschappers ([deze brief van vorig jaar is ondertekend door meer dan 800 wetenschappers](#)) die onderbouwd door honderden onderzoeksrapporten aangeven dat het verbranden van houtige biomassa voor energieopwekking funest is voor onze gezondheid, de natuur, ons klimaat en daarmee onze toekomst. U en de Nederlandse politiek baseert uw beleid echter liever op een handjevol Nederlandse onderzoekers die aantoonbaar betaald worden door de lobbybedrijven en zelfs de logo's van de betreffende energiemaatschappijen op hun onderzoeksrapporten publiceren. Dit onderzoek is de reden dat u deze brief nu pas ontvangt. Wij hadden deze brief met belangrijke informatie graag eerder aan u gestuurd omdat wij graag zouden zien dat u de antwoorden op de vragen die wij in deze brief stellen, meeneemt in het overleg met het college van Arnhem dat u heeft over de biomassacentrale naar aanleiding van [de aangenomen motie van 25 september](#).



U schrijft in uw reactie op onze laatste brief dat ‘een voortdurende mailwisseling met herhaling van argumenten en uitwisseling van standpunten niet leidt tot overeenstemming’ en geeft vervolgens aan daarom niet inhoudelijk op onze brief van 10 september in te willen gaan. We benadrukken dat in het Statenoverleg van 11 september, in de discussie voorafgaand aan [de 2 moties over de biomassacentrale](#), expliciet is gevraagd door Statenleden dat Gedeputeerde Staten de vragen uit onze brief wél zou beantwoorden. Daarnaast benadrukken we dat het niet gaat om argumenten of standpunten die wij in onze brief hebben opgenomen, maar om feiten. Meerdere leden van de Provinciale Staten hebben ons verzocht om alle leden van de Provincie te blijven voorzien van feiten die uit de onderzoeksrapporten komen en dat zullen wij dus ook doen. Daarnaast hebben wij ook uit juridisch oogpunt een plicht om u van de feiten te blijven voorzien i.v.m. de klacht die wij aan het voorbereiden zijn aan het Internationaal Strafhof.

Op de dag van het versturen van uw reactie heeft het Algemeen Dagblad een onderzoek gepubliceerd ([biomassa is een bom onder het klimaat](#)) waarin verwezen wordt naar [de onderzoeksresultaten van een panel van onderzoekers van het EASAC](#) waarbij voor de zoveelste keer de desastreuze gevolgen van het huidige beleid worden benadrukt. Aangezien u heeft gereageerd op onze brief waarin we al hadden gewezen op de onderzoeksresultaten van o.a. de EASAC en het onderzoek daarnaast door bijna alle kranten in Nederland is gepubliceerd gaan wij er vanuit dat u bekend bent met de inhoud. Mocht dit niet het geval zijn dan hebben we hieronder de weblinks opgenomen naar de desbetreffende media publicaties; [Algemeen Dagblad](#) , [Gelderlander](#) , [RTL](#) , [Parool](#) , [Welingelichte Kringen](#) , [DVHN](#) , [ZEMBLA](#) , [NRC](#) , [Telegraaf](#) , [GeenStijl](#) , [NOS](#) , [Elsevier](#) , [EASAC](#)
Mocht u onbekend zijn met dit Europees orgaan van wetenschappers dan geeft [EASAC](#) op haar website het volgende aan:

“EASAC is the voice of independent science advice, mobilising Europe’s leading scientists to guide EU policy for the benefit of society. It brings together the National Academies of Science of the EU Member States, Norway and Switzerland.”

Wij willen er bij deze nogmaals op wijzen dat het hier geen meningen betreft maar keiharde feiten waardoor u dan ook niet kan spreken van het ‘oneens zijn’ met elkaar. De realiteit is: Wij wijzen u op de feiten en u weigert deze te accepteren en verwijst vervolgens naar landelijk beleid. Minister Wiebes reageerde als volgt op het EASAC rapport:

“...er wordt door wetenschappers van alles beweerd”

Hieronder volgen een aantal vragen waarop wij graag antwoord zouden krijgen:

Vraag 1) Is de Provincie het met minister Wiebes eens dat de uitspraken van EASAC enkel beweringen betreft?

En zo ja;

Vraag 2) Beseft de Provincie dat zij daarmee het wereldwijde universitaire opleidingssysteem van de hand wijst?

Zoals gevraagd door zowel leden van uw eigen Provinciale Staten als de bezorgde inwoners van Arnhem zullen we de feiten bij u blijven aankaarten waarmee duidelijk aangetoond wordt dat u een desastreuze fout aan het maken bent met klimaatgevolgen voor de hele wereld. U gaat met open ogen en volledige kennis van zaken door met het verbranden van alleen al 30.000.000 kilo bomen per jaar in Arnhem terwijl u de [honderden rapporten](#) tot uw beschikking heeft ([inclusief onze samenvattingen](#)) waaruit duidelijk blijkt dat het verbranden van houtige biomassa voor energieopwekking funest is voor onze gezondheid, de natuur, het klimaat en daarmee onze toekomst.

In onze brief van 10 september hebben we benadrukt dat u nog altijd geen reactie heeft gegeven op het merendeel van de redenen die we hebben aangeleverd in [onze eerdere brief van 16 augustus](#) waarin we



uitleggen waarom het verbranden van houtige biomassa slecht is voor onze gezondheid, de natuur, het klimaat en de toekomst. Tijdens het behandelen door de Provincie van de beide moties tegen de opening van de biomassacentrale van Veolia in Arnhem, hebben de Provinciale Staten leden de Gedeputeerde Statenleden nogmaals gevraagd of deze op de nog niet behandelde onderwerpen zou willen reageren aan Stichting Arnhem's Peil. Voor uw gemak hebben we de links naar de pagina's met de uitwerking van die onderwerpen nogmaals toegevoegd: [Carbon dioxide](#) , [Certification](#) , [Ecotoxicity](#) , [Health Risks](#) , [Legal](#) , [Lobby Facts](#) , [LULUCF](#) , [Solutions](#) , [Subsidies](#) , [Sustainability](#) , [Whole trees](#)

Vraag 3) Is de Provincie alsnog bereid om een inhoudelijke reactie te geven op de onderwerpen en vragen uit de brieven van 16 augustus en 10 september?

U geeft in uw brief aan dat u het niet passend vindt binnen een open en democratische samenleving dat er dreigementen worden geuit over mogelijke vervolgstappen. Wij mogen hopen dat u hiermee doelt op de [dreigementen van Veolia die verstuurd zijn aan 157 bewoners in enveloppen van de Provincie](#). Het lijkt ons inderdaad niet wenselijk dat de Provincie zich aan de kant van dit soort vervuilende bedrijven schaart en dreigementen van zulke bedrijven in een envelop van de Provincie aan de bewoners uitreikt.

Mocht u echter doelen op onze uitspraak om een klacht in te dienen bij het Internationaal Strafhof in Den Haag, dan hoeft u dit geenszins op te vatten als een dreigement maar wel als een belofte. Wij zouden die ICC aanklacht na de opening van de biomassacentrale van Veolia in Arnhem indienen maar hebben besloten dit uit te stellen omdat u had aangegeven dat u spoedig op onze actualisatie- en intrekingsverzoeken in zou gaan. Daarnaast waren we in afwachting van een akkoord van alle landelijke groepen en hun inbreng van bestuurders die ook in de aanklacht opgevoerd dienen te worden omdat ze net als u er bewust voor kiezen om de belangen van internationale vervuilende multinationals te behartigen in plaats van zich druk te maken om de gezondheid van de inwoners of de schade aan de natuur, het klimaat en onze toekomst. Het zal u niet verbazen dat wij na het opleveren van de onderzoeksresultaten aan Follow The Money druk aan de slag gaan met de voorbereidingen van het indienen van deze aanklacht. Daarnaast hopen wij dat u begrijpt dat in onze ogen binnen een open en democratische samenleving het juist zeer goed is als burgers opkomen voor hun gezondheid, de natuur, het klimaat en de toekomst wanneer dat in gevaar wordt gebracht, ook wanneer de partij die de gevaren veroorzaakt leden van het bestuur van een provincie betreft. Wanneer wij zoeken naar de omschrijving van een democratische rechtstaat dan vinden wij op [Prodemos](#), het 'Huis voor democratie en rechtstaat', de volgende omschrijving:

"In een democratie is het van het grootste belang dat de wet ook wordt nageleefd, niet alleen door de burgers, maar ook door de overheid. Gebeurt dat niet, dan ontstaat willekeur, het recht van de sterkste. Een democratie is per definitie een rechtsstaat."

Wij voelen ons dus niet aangesproken door deze boodschap in uw brief maar nemen aan dat u deze boodschap ook aan Veolia heeft verzonden.

Vraag 4) Heeft de Provincie aan Veolia een brief verzonden om aan te geven dat u het niet passend vindt dat binnen een open en democratische samenleving dreigementen worden geuit aan burgers over mogelijke vervolgstappen wanneer zij opkomen voor hun welzijn en dit in een situatie gebeurt waarin de bewoners het volledige recht hebben om bezwaar te maken?

Vraag 5) Is de Provincie bereid om haar excuses aan te bieden dat ze Veolia gefaciliteerd heeft in het versturen van de desbetreffende dreigementen aan 150+ bezorgde Arnhemmers?

U spreekt in uw brief over 'een zorgvuldige afweging van argumenten binnen wettelijke kaders en goede besluitvorming en rechtszekerheid'. Wij vragen ons af binnen welk wettelijk kader het past dat de Provincie al minimaal sinds 2016 op de hoogte is van de schadelijke gevolgen van het verbranden van houtige biomassa voor onze gezondheid, de natuur, het klimaat en de toekomst en geen actie onderneemt om dit tegen te gaan.



De provincie heeft [in 2016 al uitgebreid gedebatteerd](#) over de schadelijke gevolgen van het verbranden van houtige biomassa en heeft duidelijk uitgesproken dat energieopwekking uit biomassa zeer inefficiënt is. Uit diezelfde documenten blijkt dat de Provincie Gelderland sinds 2016 ook al uitgebreid op de hoogte was dat er veel meer CO2 vrijkomt bij het verbranden van hout dan bij het verbranden van aardgas.

EN...

uit diezelfde documenten blijkt dat de Provincie Gelderland ook in 2016 al uitgebreid op de hoogte was dat na herplanting het 20 tot 100 jaar duurt voordat die extra CO2 (koolstofschuld) weer is opgevangen door nieuwe bomen.

EN...

uit dezelfde set aan documenten van de Provincie Gelderland blijkt dat ze in 2016 al wist dat de oogst van tak- en tophout tot extra verlies aan voedingsstoffen leidt en veel bodems (zoals op de Veluwe) niet in staat zijn om dat verlies te compenseren.

EN...

uit een [debatverzoek van 6 maanden later](#) blijkt dat de Provincie Gelderland al sinds 2017 weet dat er een tekort zou zijn van 70.000 ton (!) houtige biomassa in Gelderland alleen al waardoor het niet haalbaar was dat de biomassa uit een straal van 100 km rondom de centrale gekapt zou worden waardoor er nog meer CO2-uitstoot (door transport) bij komt.

EN...

de Provincie Gelderland heeft die motie van 6 maanden later aangenomen. Deze bevat exact dezelfde schadelijke gevolgen veroorzaakt door het verbranden van biomassa maar heeft opeens een andere eindconclusie. Het volgende zijn we nog aan het onderzoeken maar we achten het nu al zeer waarschijnlijk dat die wijziging het resultaat is van zware druk vanuit de Taskforce Duurzaamheid Bio-energie Cluster Oost-Nederland (deze heeft o.a. een aantal biomassacentrales als leden/klanten) en vanuit direct en indirect betaalde leden van de pro-biomassalobbyclubs zoals Bioenergy Task 40 en Biotrade 2020+.

Hieronder een quote die in beide moties voorkomt:

"-Energie uit biomassa zeer energie inefficiënt is.

- Er 2x (3x -red) zoveel CO2 vrijkomt bij stroomproductie uit hout als uit aardgas.

- Na herplanting het 20 - 100 jaar duurt voor de CO2 weer is ingevangen (koolstofschuld)

- Er voor farma, food, feed en materialen in 2030 al 25-35 megaton biomassa nodig is, er is dus niet genoeg om te verbranden.

- Oogst van hout leidt tot afvoer van voedingsstoffen, oogst van tak- en tophout leidt tot extra verlies aan voedingsstoffen en veel bodems (zoals op de Veluwe) niet in staat zijn om verlies te compenseren"

Kortom, in 2016 is er uitgebreid gedebatteerd over deze feiten, in 2017 is de motie met deze feiten aangenomen. De partijen die hier in 2016 en/of in 2017 bij betrokken waren, zijn: [GroenLinks Gelderland](#), [D66 Gelderland](#) [SP Gelderland](#), [PvdA Gelderland](#), [Partij voor de Dieren Gelderland](#), [ChristenUnie Gelderland](#), [VVD Gelderland](#), [CDA Gelderland](#).

Wij mogen als inwoners van Gelderland concluderen dat de Provincie Gelderland ondanks dat ze op de hoogte waren van de gevaren voor de gezondheid, de natuur, het klimaat en daarmee ook de gevaren voor de toekomst van ons en onze kinderen, er doelbewust voor gekozen heeft om andere belangen voor te laten gaan. De Provincie Gelderland is namelijk uitgebreid op de hoogte gesteld van de uitspraak van het hoogste gerechtshof van Nederland in de [klimaatzaak van Urgenda](#) m.b.t. uw verantwoordelijkheden. Die uitspraak stelt heel duidelijk dat ["er een reële dreiging is op een gevaarlijke klimaatverandering waardoor er een ernstig risico bestaat dat de huidige generatie ingezeten zal worden geconfronteerd met verlies van leven en/of verstoring van gezinsleven."](#) De rechter stelt in de uitspraak dat de overheid nog voor 2020 haar afspraken m.b.t. het drastisch beperken van de CO2-uitstoot om klimaatopwarming boven de 1.5 graden te voorkomen, dient na te komen. De Provincie Gelderland is ook uitgebreid op de hoogte gesteld van het laatste onderzoeksrapport van het laatste [onderzoeksrapport van het IPCC](#) en die van [de Europese Commissie](#) waarin duidelijk staat dat we geen 20 tot 100 jaar tijd meer hebben om onze CO2-schuld in te lossen.

In 2019 nemen de partijen (de partijen SP, Fvd, en PvdD uitgezonderd) van de Provincie Gelderland echter geen standpunt in maar willen zij eerst een mening vormen tijdens een ronde tafelgesprek in het najaar als de centrale al bomen aan het verbranden is [ondanks dat onze gemeenteraad kenbaar heeft gemaakt](#):

- Dat de vergunningen nooit op deze manier hadden mogen worden afgegeven als [deze feiten](#) destijds bekend waren geweest,
- Dat de komst van deze biomassacentrale op de Kleefse Waard te Arnhem als onwenselijk moet worden beschouwd,
- tegen houtgestookte biomassacentrales gestemd te hebben,
- vóór de sluiting van de Biomassacentrale op de Kleefse Waard gestemd te hebben,

Vraag 6) Heeft de Provincie door deze feiten het standpunt dat het verbranden van houtige biomassa schadelijk is?

Vraag 7) Is de Provincie het eens met de gemeenteraad van Arnhem dat een op hout gestookte centrale onwenselijk is?

Vraag 8) Is de Provincie bereid de schadelijke gevolgen van het jarenlang negeren van de reeds aanwezige kennis binnen de Provincie, recht zetten?

Dat een vergunning onherroepelijk is [betekent niet dat een vergunning niet kan worden ingetrokken](#). De afgelopen maanden zijn er meerdere [vergunningen die onherroepelijk waren, ingetrokken](#).

Vraag 9) Is de Provincie op de hoogte dat een onherroepelijke vergunning toch kan worden ingetrokken?

Vraag 10) Is de Provincie bereid om [zo snel mogelijk](#) de vergunningen te laten actualiseren- en/of in te laten trekken?

Veolia geeft in haar brief aan dat het overstappen van gas naar biomassa een verduurzamingsstap is. In meerdere officiële stukken en nieuwsartikelen komen we die stelling van Veolia tegen (“...*weliswaar niet de meest duurzame oplossing maar wel een verbetering ten opzichte van de huidige situatie...*”). Hieronder tonen we met de cijfers van Veolia aan waarom deze stelling onjuist is.

Tijdens de hoorzitting van de commissie rechtsbescherming van de Provincie werd het iedereen duidelijk dat er meerdere gasgestookte ketels van Veolia op het IPKW draaien. De oudste, grootste en meest vervuilende gasgestookte ketel is al geruime tijd geleden vervangen door de gereviseerde gasgestookte ketel 13 die na de revisie uit 2016 aan de emissie-eisen voldeed en in de nieuwe situatie naast de biomassagestookte ketel 14 zal blijven draaien. In de volgende link vindt u het document Toelichting bouw en gebruik ketel 14 IPKW van Veolia: <https://www.arnhemspeil.nl/nap/dok/2016-07-21-veolia-ipkw-arnhem-biomassa-centrale-toelichting-ketel-14.pdf>

Hieronder vindt u extracten uit bovenstaand document. De uitstoot bij het gebruik van de biomassacentrale zal groter zijn dan bij een gasketel. Veolia ontkent dit. Wij laten hieronder zien waarom Veolia het fout heeft. Hiervoor moeten we eerst wat informatie lezen van Veolia zelf:

“...Bij Veolia zijn momenteel de volgende afzonderlijke stookinstallaties aanwezig:

- *Ketel 9; op aardgas gestookte ketelinstallatie van 140 MWth ten behoeve van stoomproductie;*
- *Ketel 10; op aardgas gestookte ketelinstallatie van 1,5 MWth voor slibdroging;*
- *Ketel 13; op aardgas gestookte ketelinstallatie van 31 MWth voor stoomproductie;..”*

“...Ketel 13 is recent gerenoveerd en voorzien van 4 nieuwe branders waardoor deze ketel voldoet aan de emissie-eisen van het Activiteitenbesluit...

Ketel 9 is de WKC, welke – na de renovatie van ketel 13 – als back-up voorziening functioneert.

Ketel 9 wordt alleen nog gebruikt in geval van een storing van ketel 13 of ingeval van onderhoud aan ketel 13...”

“...Veolia wil de basisvraag aan stoom op IPKW gaan produceren met een nieuwe op schone biomassa gestookte ketel 14 [van 14.9 MWth]. Een belangrijke reden hiervoor is om haar bijdrage te leveren aan het reduceren van de CO2- emissie door fossiele brandstoffen. Een andere reden is dat het treffen van maatregelen aan de bestaande (oude) WKC vanuit economisch en milieu hygiënisch opzicht niet renderen...”

Huidige situatie:

- Inzet ketel 13: **8.760** uur/jaar (reguliere productie)
- Inzet ketel 9: reguliere inzet gepland: 0 uur; back-up voorziening (schatting: tot 500 uur/jaar)

Nieuwe situatie:

- Inzet ketel 13: **1.260** uur/jaar (reguliere productie)
- Inzet ketel 13 in plaats van ketel 14 voor peakshaving. (Schatting: tot 250 uur/jaar)
- Inzet ketel 14: **7.500** uur/jaar (reguliere productie)

Uit het actualisatie- en intrekingsverzoek van het MOB blijkt echter dat er op 20 maart 2018 nóg een gasgestookte ketel vergund is voor de gasgestookte ketel nummer 15 van 7,5 MWth. Gasgestookte ketel nummer 15 zien we niet terug in het vorige document van Veolia.

<https://www.arnhemspeil.nl/nap/dok/2019-06-17-mob-verzoek-tot-intrekken-natuurvergunning-en-actualisatieverzoek-omgevingsvergunning-veolia-biomassacentrale-ipkw-arnhem.pdf>

In het nieuwbericht van 9 januari 2019 geeft Veolia het volgende aan:

<https://www.biomassmurder.org/docs/2019-01-09-duurzaambedrijfsleven-industrieterrein-eco-industrial-park-kleefse-waard-van-industrieterrein-naar-proeftuin-dutch.pdf>

“...We hebben bijvoorbeeld een grote stoomketel gereviseerd waardoor er een stuk minder gas wordt verbruikt en de uitstoot verlaagd is... We moeten het namelijk wel kunnen rond rekenen. Een duurzame oplossing die afhankelijk is van subsidie is geen oplossing... De biomassacentrale, die gestookt gaat worden met resthout uit de omgeving, vervangt de gasgestookte warmtekrachtcentrale... Voor houtachtige biomassa betekent dit dat het in de toekomst wellicht niet de meest duurzame oplossing is, maar het is wel een verbetering ten opzichte van de huidige situatie. De eerste en oudste ketel draaide bijvoorbeeld op kolen. Dat werd vervangen door zware stookolie, voordat er werd overgestapt op gas. En nu gaan we naar biomassa. Het is elke keer een stap om te verduurzamen... stelt Lenstra...”

Het uitschakelen van die oude, grote en zwaar vervuilende gasgestookte ketel nummer 9 en het reviseren van de gasgestookte ketel nummer 13 heeft Veolia destijds al een flinke CO2-uitstoot besparing opgeleverd [van 50%](#). Zoals het er nu naar uitziet gaat Veolia echter de gereviseerde gasgestookte ketel nummer 13 die al voldoet aan de emissie-eisen grotendeels vervangen voor een biomassagestookte ketel die [4000 kilo bomen per uur](#) gaat verstoken en per opgewekte energie-eenheid (MWth) drie maal zoveel CO2 gaat uitstoten vergeleken met de gasgestookte ketel.

Toen de Partij voor de Dieren op 19 juni in de gemeenteraad aan de woordvoester van Veolia vroeg wat Veolia gedaan zou hebben indien ze geen 76 miljoen subsidie zouden krijgen op het verstoken van biomassa, gaf mevrouw Mulder aan dat Veolia dan een nieuwe gasgestookte ketel zou hebben geplaatst. U kunt die uitspraak terug zien op de volgende video van de gemeente Arnhem: [2019-06-19-gemeente-arnhem-politieke-raadszaal-betog-veolia](#)

Tijdens de hoorzitting van de commissie is Veolia nadrukkelijk meerdere malen gevraagd of de bewering van Veolia over die verduurzaming met betrekking tot het verbranden van biomassa gebaseerd is op een vergelijking met die oude, gigantische, vervuilende gasketel of dat dit vergeleken is met een nieuw te plaatsen zuinige gasgestookte ketel. De directeur van Veolia heeft daarop tot twee keer toe aangegeven dat dit in “beide” situaties het geval is. De cijfers zeggen ons iets anders.

We wijzen u er bij deze nogmaals op dat het verbranden van houtige biomassa drie maal meer CO2-uitstoot oplevert dan het verbranden van gas en zelfs anderhalf maal meer CO2-uitstoot oplevert dan het verbranden van kolen volgens de publicatie van maart van dit jaar, opgeleverd door het onderzoeksbureau van GroenLinks. De publicatie bevatte daarnaast ook de volgende passages:

"...Het is tijd om een einde te maken aan de fictie van de CO2-neutraliteit van biomassa uit de natuur. De CO2- uitstoot van deze biomassaverbranding moet gaan meetellen in de broeikasgasuitstoot van het land waar de verbranding plaatsvindt..."

"...De verbranding van vaste biomassa veroorzaakt ook nog eens veel meer luchtvervuiling dan de verbranding van aardgas ... ook grote biomassacentrales mét filters op de schoorstenen leveren problemen op voor de volksgezondheid..."

Naast het onderzoeksbureau van GroenLinks worden deze feiten ook al meer dan een decennium lang bevestigd in honderden onderzoeksrapporten van andere organisaties zoals o.a. door Greenpeace, European Environmental Bureau, OXFAM, TPFC, EPN, Southern Environment, European Commission, Environmental Paper Network, MOB, CE Delft, MDPI, FTM, Clara, PBL, Flinders University, GNMF, VOX, ShareAction, Chatham House, Global Forest Coalition, ECF, EIP, PNAS, ERL, 800 wetenschappers, Nog meer wetenschappers, En nog meer wetenschappers, En nóg meer wetenschappers, European Academies Science Advisory Council, Gezondheidsraad, FERN, WRM, Wageningen University, MAHA, PMC, WWF, Dogwood Alliance, AGU, TNI, Birdlife, Sandbag, PFPI, NRDC, LUNG, ALNP, University of Reggio Calabria, EUBioenergy, Oeko-Institute, AMBIO, GEOS institute, SEI/UM, Climate Central, ERJ, Volker-Quaschnig, Wetlands International, US EIA, MO, Transport & Environment, Sierra Club, Biofuelwatch, PFPI, ClientEarth, Forest Research, SELC, NWF, DCMR, PTC, US Court, GHP, Princeton University, RIVM, RSPB, US SAB, EEA, Manomet, Bureau of Environmental Health, Environmental Energy Alliance, TNO, ECN, EWG, DECC, WPIF, ENGO, Oregon State University, Virginia Commonwealth University.

Indien we uitgaan van de cijfers van de wetenschappers dienen we de uitstoot van CO2 per opgewekte energie-eenheid (in dit geval MWth) met een factor drie te verhogen indien biomassa gebruikt wordt in plaats van gas voor de opwekking:

Oude situatie

Ketel 13 gas: 8760 (draai uren) x 31 (MWth) = 271560 (CO2-uitstoot x 1) = **271560**

Nieuwe situatie

Ketel 13 gas: 1.260 (draai uren) x 31 (MWth) = 39060 (CO2-uitstoot x 1) = 39060

Ketel 14 biomassa: 7.500 (draai uren) x 14.9 (MWth) = 111750 (CO2-uitstoot x 3) = 335250

Totaal **374310**

Verschil

Oude situatie (gas) = 271560

Nieuwe situatie (gas + biomassa) = 374310

Extra CO2-uitstoot (gas + biomassa) = **102750**

Zoals u kunt zien aan de hand van de door Veolia opgeleverde cijfers betekent de overstap naar biomassa een gigantische hoeveelheid extra CO2-uitstoot vergeleken met de vorige situatie waarbij enkel gas gebruikt werd. Het artikel over de bouw van de biomassacentrale van Veolia is plotseling verdwenen van de website van het IPKW (pagina's van websites verdwijnen over het algemeen niet uit zichzelf kunnen we u vertellen): <https://www.ipkw.nl/nieuws/bouw-houtgestookte-biomassa-installatie-op-ipkw/>

De desbetreffende pagina is op 13 mei 2019 gecached waardoor we hem zonder veel moeite weer boven water konden halen: <https://www.biomassmurder.org/docs/2019-04-26-ipkw-bouw-houtgestookte-biomassa-installatie-van-veolia-op-ipkw-arnhem-dutch.pdf> In dat artikel geeft Veolia aan dat met het stoken van biomassa de komende jaren substantieel minder CO2-uitstoot bereikt zal worden ten opzichte van het verbranden van gas.



“...Veolia is al enige tijd bezig met de bouw van een hout gestookte biomassa-installatie op Industriepark Kleefse Waard (IPKW). Dit project zal bij in bedrijf stelling een positief effect hebben op de milieu-impact van het park. Zo voorziet Veolia jaarlijks ongeveer 20.000 ton CO2 minder uit te stoten door substantiële reductie van de inzet van aardgas...”

Ook in dit artikel beweert Veolia dat het stoken van biomassa een positief effect heeft op het milieu i.v.m. die verminderde CO2-uitstoot. Bij deze vragen we u nogmaals kennis te nemen van de overweldigende hoeveelheid onderzoeksrapporten met feiten waarin die stelling van Veolia nadrukkelijk weerlegt wordt: [Dit is een link naar de onderzoeksrapporten over de extra CO2-uitstoot die vrijkomt bij het verbranden van biomassa ten opzichte van gas.](#)

Vraag 11) Is de Provincie op de hoogte dat deze nieuwe opstelling aanzienlijk meer CO2-uitstoot als gevolg heeft?

Vraag 12) Hoe borgt de Provincie dat de 76 miljoen SDE subsidie beperking van CO2-uitstoot oplevert zoals bedoeld?

Veolia zou een open en transparante communicatie met de omwonenden van de biomassacentrale onderhouden. In het artikel van [9 januari 2019](#) geeft Veolia o.a. het volgende aan:

“...Voor een eco-industrial park is echter ook het sociale aspect belangrijk. In een straal van 3 kilometer van IPKW liggen verschillende woonwijken. De bewoners worden zoveel mogelijk bij de plannen van het industriepark betrokken. “Open en transparante communicatie is heel belangrijk. Bedrijven kijken vaak alleen naar het technische stuk maar ook het sociale component is essentieel. Bij bewoners heerst soms angst voor veranderingen maar door te communiceren kan dit vaak worden weggenomen... Ook hebben we enkele problemen met geluidsoverlast voor omwonenden direct aangepakt... ,stelt Lenstra...”

Wij wonen binnen een kilometer afstand van de biomassacentrale en hebben nog nooit ook maar één brief, mailtje of belletje ontvangen van Veolia. We hebben bij meerdere bewoners die op 300 meter van de biomassacentrale wonen, gevraagd of zij ooit een brief, mail of telefoontje van Veolia ontvangen hebben of iets weten van meldingen over geluidsoverlast en alle bewoners die wij gesproken hebben, geven aan daar niets van te weten.

Vraag 13) Is de Provincie van mening dat Veolia een voldoende open en transparante communicatie onderhoud?

Veolia geeft aan een leveringscontract te hebben afgesloten met een gecertificeerde instantie die handelt onder de naam Bio-enerco (we gaan er vanuit dat Veolia [bio-enerco BV](#) bedoelt) die volgens de richtlijnen van de NTA 8080 en Beter Biomass certificaat zouden werken. Veolia geeft aan dat zij er vanuit moeten kunnen gaan dat deze volgens die normen werken.

De certificering van houtige biomassa die Veolia benoemt, wordt [ondanks 10 jaar overleggen](#) nog steeds niet internationaal erkend voor de levering van houtige biomassa. De verwijzing naar [desbetreffende certificering](#) maakt daardoor weinig indruk. [www.nta8080.org](#) en [www.betterbiomass.com](#) verwijzen beiden naar dezelfde website, het betreft hier dan ook dezelfde certificering. Veolia lijkt echter met het woordje ‘en’ de indruk te willen wekken dat er sprake is van twee certificaten. Bio-enerco is daarnaast helemaal niet terug te vinden op het [overzicht van certificaathouders](#) van de Better Biomass organisatie waardoor we ook hier twijfel hebben over de bewering van Veolia.

Bio-enerco BV is één van de drie BV's van Staatsbosbeheer. Bio-enerco heeft één medewerker in dienst die dan ook meteen de directeur is maar ook een medewerker van Staatsbosbeheer is. Die medewerker van Staatsbosbeheer werkt al sinds 2002 voor Bio-enerco. In datzelfde jaar is hij ook gaan werken als het bestuurslid van de FSC-organisatie die verantwoordelijk is voor de certificering van het hout dat o.a. Staatsbosbeheer levert. Dat wil dus zeggen dat de directeur van het bedrijf dat het hout verkoopt, ook bestuurslid is van het bedrijf dat het hout keurt. Deze dubbele belangen hebben plaatsgevonden van 2002

tot 2017. Daarnaast is deze medewerker van Staatsbosbeheer en Bio-enerco ook nog eens één van twee medewerkers van de tweede (van drie totaal) biomassaleverende BV's waardoor de hele constructie nog meer vraagtekens oproept. De desbetreffende persoon werk al sinds 1999 voor Staatsbosbeheer en heeft hierdoor dus drie dubbele belangen bij de verkoop van hout door Bio-enerco. Uit de [jaarcijfers van Staatsbosbeheer \(2019\)](#) komt namelijk duidelijk naar voren dat een zeer groot deel van de inkomsten van Staatsbosbeheer van de houtkap voor biomassa komt. Een ander groot deel van de inkomsten van Staatsbosbeheer komt van de Natura-2000-subsidies die de massale houtkap voor biomassaproductie nog eens extra aanwakkeren. Zonder die inkomsten en subsidie zou Staatsbosbeheer haar broek niet kunnen ophouden en zouden veel medewerkers van Staatsbosbeheer op straat komen te staan. Dit dwingt Staatsbosbeheer om zoveel mogelijk bomen te kappen die opgestookt zullen worden in uw biomassacentrale.

Uit [meerdere rapporten van gerenommeerde instanties](#) blijkt dat er [te weinig biomassa aanwezig](#) is in [Gelderland om de biomassacentrales te voorzien van brandstof](#). Tijdens de hoorzitting gaf de directeur van Veolia aan dat dit dan een probleem voor Bio-enerco zou zijn. Hij gaf aan hierover afspraken in het contract opgenomen te hebben en mocht er te weinig biomassa aangeleverd kunnen worden dan zou dat door middel van een schadeclaim afgedekt zijn. Wij vinden dit nog een extra perverse prikkel die er mogelijk voor gaat zorgen dat de bomenkap nog minder duurzaam uitgevoerd gaat worden dan nu al het geval is.

We halen de volgende informatie uit de documentatie van Veolia:

<https://www.arnhemspeil.nl/nap/dok/2016-07-21-veolia-ipkw-arnhem-biomassa-centrale-toelichting-ketel-14.pdf>

“...Veolia benadrukt dat de te gebruiken brandstof bestaat uit schoon hout. Het betreft zogenaamde wood chips, die direct afkomstig zijn uit de bosbouw en het betreft materiaal dat wordt gekweekt met het doel om het in te zetten als biobrandstof...”

“...Voor het gebruik van de nieuwe ketel 14 wordt gebruik gemaakt van de SDE-subsidieregeling van de rijksoverheid. Eén van de voorwaarden van deze subsidieregeling is dat de ketel maximaal 7.500 uur per jaar mag worden benut...”

“...Het betreft maximaal 9 vrachtwagens per etmaal; 8 voor de aanlevering van de biomassa en 1 voor de levering van ureum of de afvoer van asresten...”

“...Het verbruik van biomassa in deze stookinstallatie bedraagt ca. 4 ton per uur...”

Volgens het [SDE verificatieprotocol voor duurzame biomassa voor energietoepassingen uit 2019 \(RVO\)](#) mogen in 3 van de 4 categorieën van houtige biomassa naast de takken, tophout en primaire residuen ook “bomen” verbrand worden.

Volgens de cijfers van Veolia zal jaarlijks 30 miljoen kilo hout van bomen verbrand worden in de centrale: 4000 (kg bomen per uur) x 7500 (draai uren) = 30.000.000 kg bomen per jaar. De hoeveelheid CO2 die Veolia hiermee extra uitstoot, vergeleken met het verbranden van gas, gaat nog decennia duren voordat deze weer is opgenomen door nieuwe bomen (indien die NU geplant worden, [wat grotendeels niet gebeurt](#)). Volgens het laatste [onderzoeksrapport van het IPCC](#) en die van [de Europese Commissie](#) hebben we geen tijd meer om deze CO2-schuld in te lossen. Elke boom die we kappen en verbranden maakt het probleem groter.

Naast de aanvoer van de biomassa is volgens Veolia Bio-enerco ook verantwoordelijk voor de as-afvoer van die verbrande 30 miljoen kilo bomen. We hebben hierover geen enkele garantie voorbij zien komen in de vergunningaanvragen dat dit ook duurzaam wordt afgevoerd en verwerkt. Veolia gaf bij de commissie aan dat Veolia geen politieagent is en er op moest kunnen vertrouwen dat de leverancier zich aan de regels zou houden. Zoals ook in andere bedrijfstakken geldt, zijn wij van mening dat Veolia wel degelijk de verantwoordelijk heeft om uit te zoeken of de leverancier zich aan de regels houdt indien daar aanleiding voor gegeven wordt om anders te vermoeden.

Vraag 14) Is de Provincie op de hoogte dat de biomassa geleverd wordt door organisaties met belangenverstrengelingen?

Vraag 15) Is de Provincie het met ons eens dat de genoemde belangenverstrengelingen onwenselijk zijn?

Vraag 16) Hoe gaat de Provincie waarborgen dat er sprake is van duurzaam geproduceerde biomassa van gecertificeerde hout wat enkel afkomstig is van snoeiafval, terwijl de certificaten internationaal niet erkend worden en Bio-enerco desbetreffende certificaten niet eens bezit en de organisaties die de certificaten afgeven financiële belangen hebben en/of rechtstreeks beïnvloed worden door lobbypraktijken van de grote energiemaatschappijen (o.a. door Veolia)?

Vraag 17) Veolia geeft aan dat Bio-enerco een schadeclaim kan verwachten van Veolia wanneer zij geen hout kunnen leveren. De rapporten geven aan dat er niet genoeg hout uit de omgeving kan worden gehaald. Bio-enerco zal dus gedwongen worden hout te importeren, om schadeclaims te voorkomen. Wat gaat de Provincie doen om dit te voorkomen?

Vraag 18) Volgens het SDE verificatieprotocol voor duurzame biomassa voor energietoepassingen uit 2019 (RVO) mogen in 3 van de 4 categorieën van houtige biomassa naast de takken, top hout en primaire residuen ook “bomen” verbrand worden. Hoe gaat de provincie voorkomen dat er hele bomen verbrand gaan worden ondanks dat dit mag volgens het SDE verificatieprotocol en Veolia aangeeft dat ze kweekbos gaan gebruiken als houtige biobrandstof?

Vraag 19) Is de Provincie van mening dat Veolia geen verantwoordelijkheid heeft om te toetsen of Bio-enerco wel degelijk duurzame biomassa aanlevert uit de regio (uit een maximale straal van 100 kilometer rondom de centrale) en ook op een duurzame wijze de as-afvoer verwerkt?

Vraag 20) Gaat de Provincie de verantwoordelijkheid op zich nemen om te toetsen of Bio-enerco wel degelijk duurzame biomassa aanlevert uit de regio (uit een maximale straal van 100 kilometer rondom de centrale) en ook op een duurzame wijze de as-afvoer verwerkt?

Vraag 21) indien de Provincie niet bereid is om de verantwoordelijkheid te nemen om te toetsen of Bio-enerco duurzaam geproduceerde biomassa aanlevert, wie is er dan wel verantwoordelijk om te toetsen of dit gebeurd?

Vraag 22) Bent u bereid om op al onze vragen in de volgorde zoals deze gesteld zijn antwoord te geven en daarbij niet te clusteren?

Bij voorbaat dank voor uw reactie,

Met vriendelijke groet,
Bestuursleden van
Stichting Arnhems Peil

www.arnhemspeil.nl
www.biomassmurder.org
www.edsp.eco

Op dit moment is het team van Arnhems Peil & EDSP ECO druk bezig om de laatste rapporten, nieuwsberichten en analyses beschikbaar te stellen. De meest actuele lijst van rapporten is op de volgende pagina te vinden: <https://www.biomassmurder.org/docs.html>

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