

Provinciale & Gedeputeerde Staten Leden Provincie Gelderland
Provincie Gelderland Postbus 9090 6800 GX Arnhem

Onderwerp: Rondetafelgesprekken over de inzet van biomassa en de betaalde pro biomassa lobby

Datum: 14 februari 2020

Geachte Provinciale & Gedeputeerde Statenleden,

Hartelijk dank voor de uitnodiging voor de rondetafelgesprekken over de inzet van biomassa op 4 maart.

We vinden het jammer dat het meer dan zeven maanden heeft moeten duren, dat er eerst een [mond dood protestactie voor nodig was](#) en dat u bij de vorige rondetafelgesprekken van eind vorig jaar over biomassa de betaalde pro-biomassa lobby heeft uitgenodigd voordat u ons uitgenodigd heeft.

We zouden op 4 maart graag wetenschappers meenemen naar de rondetafelgesprekken die wel de belangen van onze gezondheid, de natuur, het klimaat en daarmee onze toekomst behartigen en niet [betaald worden door](#); Essent (RWE), ENGIE (GDF SUEZ/Electrabel), Uniper (EON-UK), Vattenfall (NUON), Veolia (Ennatuurlijk), Navigant (Ecofys), BTG, Bioforte, Brinkmann Consultancy, Borgman Beheer of de overige organisaties in de Nederlandse houtkap- en verwerkingssector.

Invloed van de betaalde pro-biomassa lobby op de Provincie Gelderland

De organisator van de rondetafelgesprekken van de Provincie is ook de 'programmaleider Biobased Economy'. Voorheen werkte zij voor de organisatie [Bosgroepen die de SNL-subsidies \(voor o.a. biomassa\)](#) regelde voor de deelnemers van de Koninklijke Nederlandse Bosbouwvereniging. De regionale energie- en klimaatstrategie specialist van de Provincie Gelderland die het ['Informatie document Biomassa voor Ronde Tafel Biomassa 11 december 2019'](#) heeft opgeleverd en daarover in de inleiding heeft aangegeven "Dit document bevat feitelijke informatie" is verbonden aan de betrokken [wetenschappers \(gefinancierd door Essent / RWE\) in het betaalde pro-biomassalobbyonderzoek](#) die uitgenodigd waren voor het rondetafelgesprek en als adviseur van gedeputeerde Jan van der Meer fungeren. Ook heeft hij contact met een flink aantal directe pro-biomassalobbyisten die de documenten voor het rondetafelgesprek aangeleverd hebben:

[Borgman Beheer Advies](#), heeft documenten aan mogen leveren als input voor het rondetafelgesprek van de Provincie en is een grote speler in de levering van houtige biomassa (afkomstig van hele bomen) en uitgebreid betrokken bij de betaalde pro-biomassa lobby in Nederland.

[BTG Biomass Technology Group](#) heeft documenten aan mogen leveren en heeft grote belangen in de biomassa handel en betaald dan ook 75.000 euro per jaar aan de pro-biomassa lobby in alleen al de EU (Nederlandse lobby kosten niet meegerekend).

[Ecofys \(Navigant\)](#) heeft documenten aan mogen leveren en betaald meer dan een miljoen euro per jaar aan de pro-biomassa lobby in de EU (Nederlandse lobbykosten niet meegerekend).

[Probos bestaat uit 20 organisaties](#) die een belang hebben bij het oogsten en de handel in houtige biomassa en 16 van die 20 organisaties zijn daadwerkelijk betrokken bij de betaalde pro-biomassalobby in Nederland.

[De NVDE](#) vertegenwoordigd o.a. Alliander, Eneco, EnNatuurlijk (Veolia), Enexis, Essent (RWE), Nuon (Vattenfall), Platform Bioenergie, Stedin en Tennet en heeft informatie mogen aanleveren terwijl de meerderheid van de bestuursleden en werknemers (afgezien van de stagiaires en ondersteunend personeel) uit de top van de betaalde pro-biomassalobbyorganisaties komen.

Houtige biomassa bestaat voor 95% uit stamhout met een minimale doorsnede van 10 cm

Op [06-09-2019](#) ontvingen we een brief van John Berends, de Commissaris van de Koning waarin hij het volgende beweerde:

“De residuen van bosbeheer worden benut voor energieopwekking... Het is afval afkomstig uit onderhoud van bos en groen. Het is niet zo dat hierdoor bos verdwijnt.”

Op [03-01-2020](#) beweerde Gedeputeerde Jan van der Meer in de Gelderlander het volgende:

“De negentien centrales in Gelderland draaien op dit moment alleen op snoei- en afvalhout uit Nederland en omliggende landen. Dat gaat ook gelden voor de twaalf nog geplande centrales in deze provincie.”

Hieronder ziet u uit de documentatie van Staatsbosbeheer (aangeleverd als officieel stuk in de rechtbank) dat de stammen van bomen die geveld worden voor de biomassaproductie minimaal 10 cm doorsnede dienen te hebben en dat blad en naalden en dunnere takken onwenselijk zijn.

2. De partij hout bestaat uit stamhout van meer dan 10 cm doorsnede of ter plaatse van de velling of snoei versnipperd hout

Toelichting:

- Dit criterium is gebaseerd op het praktijkgegeven dat dit de twee gangbare vormen zijn van hout verkregen bij velling of snoei dat een bestemming krijgt als grondstof voor de houtverwerkende industrie, als bodembedekker of als brandstof.
- De norm van 10 cm is bedoeld als handvat voor globale visuele beoordeling; in de praktijk is stamhout doorgaans duidelijk dikker en is het verrichten van diktemetingen voor controle niet nodig. Bij twijfel (van de handhaver) is de bewijslast aan de houder.

3. De partij hout bevat niet meer dan 5 gewichtsprocent aan:

- takken dunner dan 10 cm, bladeren, naalden of gras;

Dit komt overeen met het verificatieprotocol van de RVO uit 2019 waarin de eisen voor houtige biomassa zijn opgenomen waarbij voor drie van de vijf categorieën houtige biomassa bomen zijn opgenomen naast de takken, top hout, en primaire residuen: [2019-02-26-rvo-sde-verificatieprotocol-duurzaamheid-vaste-biomassa-voor-energie-toepassingen-dutch.pdf](#)

Via de volgende link hebben we een flink aantal video's beschikbaar gesteld mocht u na de bevestiging van Staatsbosbeheer (juridisch stuk) en het RVO verificatie protocol voor houtige biomassa nog twijfel hebben of houtige biomassa uit Nederland van hele bomen komt: <https://www.youtube.com/channel/UCsPTY4-eaGNtA-kle36hngQ/videos>

Bomen tekort en recente studies over het verdwijnen van de CO2-opslag capaciteit in het bos

In 2019 verwezen meerdere natuurorganisaties naar [een rapport van het onderzoeksbureau Alterra](#) van de Wageningen University & Research (WUR) waarin is vastgesteld dat het bosoppervlak in Nederland tussen 2013 en 2017 met 5400 ha is afgenomen. Frits Mohren Professor of Forest Ecology & Forest Management heeft in 2019 [in een publicatie](#) aangegeven dat het verdwijnen van het grote aantal hectare bos komt door het wijzigen van de natuurwet. Ons onderzoek heeft aangetoond dat de natuurwet juist gewijzigd is om de productie van grote hoeveelheden houtige biomassa mogelijk te maken.

Tijdens ons onderzoek naar de oorzaak van de massale bomenkap op de Veluwe hebben we veelvuldig geconstateerd dat de medewerkers van Staatsbosbeheer zich wel degelijk [zorgen maken](#) over het huidige beleid. Ook de heer Mohren geeft aan zich zorgen te maken over het huidige beleid en zegt hierover:

“Toch ervaar ik dit hele proces nu wel als een probleem. We hebben al zo weinig bos en we hebben zoveel moeite moeten doen 100 jaar geleden om dat aan te leggen. En dan zijn we nu met al onze welvaart niet in staat om dat te beschermen. Dat is schrijnend.”



Staatsbosbeheer geeft al [sinds 2015](#) meerdere keren per jaar aan dat het intenties heeft om extra bos aan te leggen ter compensatie van de gevelde bossen. Vijf jaar later is daar nog weinig van terecht gekomen. Eind vorig jaar maakte Staatsbosbeheer nogmaals bekend dat ze de verdwenen [5000 hectaren bos](#) alsnog willen aanplanten maar gaven meteen ook aan dat er voor [de komende drie jaar](#) te weinig bomen zaad en stekken beschikbaar zijn voor de beloofde herplant van die bossen. Hieronder hebben we uitgelegd waarom de Provincie er onmiddellijk voor dient te zorgen dat er gekapt wordt met kappen.

Uit [meerdere studies](#) blijkt dat er heel veel CO₂ wordt opgeslagen in de bovenste bodemlaag in bossen en dat bosbeheer door het mechanisch oogsten van stam-, tak- en tophout met zware machines, permanente schade aan die toplaag veroorzaakt, [wat tot minder CO₂-absorptie en opslag leidt](#). In juni vorig jaar werden die wetenschappelijke onderzoeksresultaten nog een keer bevestigd in een zeer uitgebreid onderzoek waarin de duidelijke conclusie is opgenomen [om bossen intact en op een natuurlijke beloop](#) te laten. [In de initiatiefnota](#) van de Tweede Kamer van eind vorig jaar over het Nationaal Bomenplan is opgenomen dat oude bomen een extra grote bijdrage aan het klimaat leveren: uit gegevens van de Bomenstichting blijkt dat een boom van 150 jaar oud evenveel water verdampt en CO₂ opslaat als 500 bomen van 10 jaar oud bij elkaar. Een maand later publiceerden Professoren van 8 universiteiten [een onderzoek](#) waaruit blijkt dat een beheerd bos tot wel 626 % minder CO₂ vastlegt als een bos wat men met rust laat.

Mocht u nog uitgebreide en diepgaande uitleg behoeven over elk onderwerp van houtige biomassa waarover specifiek Chef Klimaat Gedeputeerde Jan van der Meer voorspiegelt dat het een goed idee is, lees dan deze publicatie van de voormalige Secretaris van het Gelderse Energieakkoord en medewerker van Klimaatverbond Nederland: [De beperkte bijdrage van biomassa aan de energietransitie](#).

Gevolgen bij het uitblijven van concrete actie

Wij zien ons in het belang van de rechtstaat, de inwoners van Arnhem en omgeving en de goede naam van onze Provincie genoodzaakt om via deze weg nogmaals een zeer dringend appel op u te doen om nu eindelijk invulling te geven aan uw verplichting richting de burgers van Arnhem om onze gezondheid, de natuur, het klimaat en daarmee onze toekomst te beschermen. We verwachten dat u concreet in actie komt om op korte termijn een daadwerkelijke oplossing te bewerkstelligen. De hoogste rechter heeft in de Urgenda uitspraak bepaald dat de overheid zich aan haar verplichting dient te houden om de CO₂-uitstoot voor eind 2020 te verminderen. De Provincie Gelderland kiest er echter voor om die CO₂-uitstoot juist te verhogen. [In die uitspraak](#) van de Urgenda Klimaatzaak stelt de rechter heel duidelijk dat *“er een reële dreiging is op een gevaarlijke klimaatverandering waardoor er een ernstig risico bestaat dat de huidige generatie ingezetenen zal worden geconfronteerd met verlies van leven en/of verstoring van gezinsleven.”*

Bij het uitblijven van concrete actie om het oogsten en verbranden van houtige biomassa ten behoeve van energieopwekking te voorkomen dwingt u ons om o.a. de Gedeputeerde Statenleden van Gelderland, Minister Wiebes en de Premier te laten vervolgen voor de schade die ze met het huidige beleid en door het uitblijven van actie veroorzaken aan onze gezondheid, de natuur, het klimaat en daarmee onze toekomst. Omdat er nog steeds Provinciale Statenleden zijn die geen duidelijk signaal hebben afgegeven dat het ontoelaatbaar is dat de Provincie er bewust voor kiest om de uitstoot van schadelijke stoffen te verhogen zullen we binnenkort een publiekelijk toegankelijk register aanleggen waarin we de desbetreffende leden van de Provincie zullen vastleggen die verantwoordelijk zijn voor het uitblijven van actie.

Met vriendelijke groet,
Jeroen & Marloes Spaander
Stichting Arnhems Peil
+31 (0) 6 2888 3999

www.arnhemspeil.nl

www.edsp.eco

www.biomassmurder.org

www.the-fab.org

Bronnen:

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