

Society for the Preservation of the Pearl (of Grubbenvorst)  
c/o Winterheide 3  
5971 GD Grubbenvorst  
The Netherlands

Grubbenvorst, November 2nd 2008

Regarding: reaction concerning public inquiry

Dear sir/madam,

With this letter we would like to make use of the possibility of giving our reaction in the public inquiry with regard to the 'Inspraakwijzer NSL', as well as our objections.

Our society is currently located in Grubbenvorst, municipality of Horst aan de Maas in Limburg. That is why we only focus on the interests we feel we have to represent in our region. Institutions such as 'Stichting Natuur en Milieu' (Society for Nature and Environment) and 'Stichting Milieu Federatie Limburg' (Society of Environmental Federation Limburg) – of which we are a member – have focused their reaction on the situation in The Netherlands as a whole. We support the reactions these societies have given.

## **1. Objections and remarks**

As far as our society is concerned the issues are the following:

- 1 The treaty of Århus (VvÅ) is not executed properly;
- 2 In the calculation of the presence of particulates in the air we believe a percentage is deducted unjustly because of the alleged presence of sea-salt whereas at the same time not enough attention is paid to the more dangerous fine particles of PM<sub>2.5</sub>. Moreover the number of measuring locations is not sufficient. There hasn't been such a location in Venlo for years now.
- 3 Rules for testing the environmental permits as well as surveying these permits have still not been properly regulated by the legislator.
- 4 We reject the standards concerning air pollution for housing estates – existing or planned – alongside motorways or ordinary roads. And conversely we object to new motorways alongside housing accommodation.
- 5 Within the Region of Venlo (Noord-Limburg) there are a great number of plans which are not featured accurately in the 'Inspraakwijzer NSL'. More specifically, these planned projects concern Greenport Venlo, subdivided into 'Klavertje Vier', Greenport Lane, Trade Port North, Floriade, the greenhouse projects of 'Californië' and 'Siberië', the expansion of the auction etc. The particulates emanating from these projects together with the planned installation of the so-called New Mixed Farming Company (NGB) – just outside the Greenport area in the designated agricultural development area (LOG) Witveld *and* the ensuing transport movements have not been mapped. Whereas actually an accumulation of particulate matter will take place. In our opinion the Region of Venlo has to be considered as a separate agglomeration, comparable to Heerlen or Eindhoven (see table 0.1 page 14 NSL Cabinet viewpoint, appendix).

- 6 In the directory for public inquiry we feel that the consequences of intensive stock farming for the air quality have been taken into account insufficiently. The position stating that the effects of this sector have not been mapped adequately must never be an excuse for not mentioning them in the directory.
- 7 We do not agree with raising the limit of non-significant (NIBM) – mainly concerning PM<sub>10</sub> and NO<sub>2</sub> – from 1 % to 3 %. Raising the limit leaves room for numerous small, new sources. We feel the consequences of this approach for policy ambitions need at least to be made clear. In our opinion raising the limit is contrary to the Health Care Law of Collective Prevention.
- 8 We do not agree with the fact that industrial estates are not taken into account in the calculations concerning air quality. Note that this viewpoint combines with our remark made under 5.
- 9 The directory for public inquiry is deficient, especially when considering it is not only humans who require good air quality. One needs to take into account – also to the interest of man by the way – all forms of life. An integral approach also shows the effects of excessive ammonia deposit – i.e. PM<sub>2.5</sub> – on the entire flora, fauna, fungi etc. The title of the document ‘Room for clean air’ raises expectations which are not met. It lacks especially the integral approach.

All in all we conclude that we are dealing here with a document in which false assumptions are handled, incorrect data are stated and eyes are kept shut for the true problems! ‘Errare humanum est’. Therefore our urgent advice is: think and do it over again.

## 2. Explanation

### *Ad 1: The treaty of Århus (VvÅ)*

The treaty of Århus (we refer to the entire text of the treaty) guarantees the right for everyone to access to information<sup>1</sup>. The directory for public inquiry proves to be incomplete concerning the information about the issues mentioned.

### *Ad 2. Calculation particulates*

Article 2, paragraph 3 sub b (VvÅ) refers among other things to numerous natural substances such as sea-salt. It is incorrect to subtract sea-salt from the measured quantity of particulates PM<sub>10</sub> and PM<sub>2.5</sub>. As far as we are concerned legislation on this point needs to be revised.

Also see Appendix 1 (letter by lung specialist A. Lukker).

The WHO indicates that PM<sub>2.5</sub> is of greater importance in health matters than PM<sub>10</sub>. PM<sub>2.5</sub> is a so-called secondary aerosol. It originates among other things from ammonia. The quantity of ammonia in the air rises as well as PM<sub>2.5</sub>. According to Environmental Balance (Milieubalans)2008 the NEC goal of 128 kton NH<sub>3</sub> for 2010 will probably be achieved.

The report states that the enlargement of the milk quota and the likely abolition of animal rights around the year 2013 have not been taken into account here. The emission will probably rise to 143 kton between 2010 and 2020.

A third important point with regard to the calculation of particulates in the air concerns the fact that The Netherlands does not have enough measuring locations. More specifically,

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<sup>1</sup> *Artikel 1 : Objective*

*In order to contribute to the protection of the right of any person of present and future generations to live in an area suitable for his/her health and well-being every participant guarantees the rights to access to information, inquiry into the decision-making and access to court concerning environmental issues in correspondence with the regulations of this treaty.*

Venlo has been in need of such a location for years. On the subject of the measuring location that is said to be 'representative' for the region of Venlo – location number 131, Vredepeel-Vredeweg – we state clearly that it cannot be considered as such. It only measures the background pressure. Looking at the increase of for example the traffic, especially after the A 73 was put in use, and the intensive stock farming in our region over the last years you should have installed a permanent measuring station the Zaarderheiken Junction. This is where you break your own rules<sup>2</sup>.

*Ad 3. Testing environmental permits and maintenance are not regulated sufficiently by legislator*

Building projects, intensive stock farming companies, road building etc. are becoming larger in scale. And as a result of these large-scale plans they have an increasing impact on the environment. At the same time the 'circle of parties concerned' is becoming more restricted. This is contrary to the treaty of Århus ('access to court')<sup>3</sup>.

Supervising maintenance of the executed projects can be called problematic, especially with regard to the intensive stock farming. This is the obvious conclusion on reading the publication of 'De tijd is rijp' (The time is ripe) in July 2008 by the committee for the revision of the maintenance system VROM (Housing, Area Planning and Environment) regulation. The highly alarming conclusions in this report call for measures leading to a speedy improvement of the wretched level of environmental maintenance. We like to remark that overturning an operating system entirely rarely shows better results, especially not at short notice. In our opinion the legislator needs to enlarge the regulations and abandon the restriction of the 'circle of parties concerned', according to the said treaty. In fact, the regulation system merits enlargement, adapted to the developments of the current image of the time and more clearly adjusted to the treaty of Århus.

Illustrative of this is the procedure with the companies that have to comply with IPPC. They should have met with the demands of BBT a long time ago. Despite repeated rebukes from 'Brussels' the Dutch policy of vague sanctions has led to ineffective problem-solving so far, contrary to all the fine promises that were made. The Society for the Preservation of the Pearl has done some investigation into the maintenance in the region of North-Limburg and later also in the region of South-East Brabant. In July 2008 we started inquiring after environmental permits of all IPPC companies in the municipality of Horst aan de Maas and the adjoining merger municipalities of Sevenum and Meerlo-Wanssum. We extended the inquiry to the municipalities of Gemert-Bakel, Venray and Valkenswaard. Together with the inquiry we referred to article 4 of the Treaty of Århus. Furthermore we asked for a survey of IPPC companies that do not yet meet the BBT demands. Our investigation shows :

1. Most municipalities did not provide us with the permits nor the survey within the 4-week term, as stated in the Treaty of Århus (article 4, paragraph 2).
2. Most of the municipalities sent us information about the permits and the survey that was incomplete.
3. A number of municipalities did not respond at all.
4. There are a number of companies that should have been BBT by now.
5. Occasionally the permit was not available as it could not be found in the municipal archives !

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<sup>2</sup> Measuring regulation air quality 2005, a.o. paragraph 4, installing measuring stations, article 6 and 7 a: *in areas within zones and agglomerations where the highest concentrations are found to which the residents are exposed directly or indirectly, during a period which is significant with regard to the average time of the concerning ultimate value; etc*

<sup>3</sup> 'Led by the intention to allow the public, including organisations, to get access to efficient mechanisms of jurisdiction, in order to protect their rightful interests and administer justice.'

6. It appears that a number of companies have been called to order every time with regard to violating environmental regulations. For example we possess correspondence – containing over a hundred e-mail messages – which shows that insufficient action has been taken. The mayor and aldermen in charge simply left the complaining citizens to their own devices.

The above results leave us to conclude that maintenance needs to be more stringent. Sanctions must be higher and need to be imposed on sooner. The citizen who reports must be taken seriously and not put aside as a ‘whiner’, which seems to be common practice nowadays. For example the Council of State has recently stopped recognizing the Society for Open Space Amsterdam (Stichting Openbare Ruimte Amsterdam) as a so-called concerned party. This is very odd since it was this society that made a stand against improper issue of environmental permits by the authorities. See the article by Mr. Wösten in NRC Handelsblad on October 25th 2008 (appendix 2)<sup>4</sup>.

In our opinion it is obvious that the (local) authorities do not stick to the environmental regulations. Too much particulate matter and deterioration of the air are being tolerated by the local authorities. Environmental movements are not taken seriously and moreover find themselves stunted in investigating transgressions of the law. In practice this will result in people organizing themselves more emphatically in a different way so as to claim their right, if needs be in court.

#### *Ad 4. Standards for (planned)housing estates along motorways or ordinary roads*

It is alarming to find that the authorities keep such liberal standards for particulates with regard to building projects alongside motorways and other roads. We refer to the report by the society for Nature and Environment, in which is concluded that the limit for particulate matter appears to be a goal in itself. Whereas any general practitioner or lung specialist can point out the danger of living in an area with too much particulate matter. Investigations show more and more that in fact there is no limit below which particulate matter does not hold a threat to public health. In that sense the problem of particulates compares to that of asbestos.

We can conclude that the authorities, rather than tackling the problems which are a result of too much particulate matter in the air, prefer to adjust the standards which would otherwise be hard to comply with! The least thing that could be done is install speed limits so as to improve the air quality. Another option – which is insufficiently put into practice – is applying better and more robust plantation along planned and existing roads. Note that this option can only be applied unless there is no impairment to the open landscape.

#### *Ad 5. Consider the Region of Venlo as a separate agglomeration<sup>5</sup>*

At the moment the Region of Venlo finds itself confronted with a great number of plans which are not featured. These are the following plans/projects:

- Expansion of the auctions ZON and Flora Holland and the adjoining industrial area. The auction ZON is going through a phase of extensive growth these last few years, especially with regard to the industrial area, and is still expanding further north to-

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<sup>4</sup> Wösten: *‘It is absolutely unclear why a critical attitude towards authorities – using legal remedies – is considered lawful in tax matters, criminal law, education, health care etc. but is treated differently with regard to the environment and care for nature. The often poor quality of decisions made by the authorities as far as environmental right is concerned remains unnamed. It is precisely there that the society c.s. finds its legitimization. Why don’t the papers know how appalling the quality is? Why is there so little attention for the practice: that is where all the fine talk is turned into truth’.*”.

<sup>5</sup> See appendix 3, a map showing the matter from a topographical perspective.

wards the village of Grubbenvorst. More and more buyers and suppliers regard the complex as an outstanding location. The big sheds in which the commercial activities take place have a negative effect on the air quality. In times to come not only vegetables, fruit and flowers will be marketed here but also meat and other consumer goods. As a result of this the number of transport movements<sup>6</sup> will increase both on the site itself and via the approach. At the moment there are plans to divert the approach to the complex (northward – exit from the A 73 – see appendix 4) and lay out Greenportlane (see hereafter). This will lead to a much higher quantity of particulates and NO<sub>2</sub> for the neighbouring village of Grubbenvorst. Momentarily the distance is 1.5 kilometre, but it will become 1 kilometre. The elderly home on the border and the children's day care will be confronted with a deterioration of the air quality.

- Greenportlane (connecting road – a motorway – between the A 73 and the A 67), will be constructed to open up the adjoining area of Greenport.

As stated before the authorities do not take into account the presence of industrial Areas when determining the measure in which the air quality is affected in a negative way. At the same time the number of expected cars and lorries on this road are estimated to determine the capacity.

- 'Klavertje Vier'.

This is in fact an industrial area overlapping a region, in which the consequences for the air quality will be in keeping. In any case the provincial authorities or the State will have to look into this integrally and emphatically. The increase of internal and external transport movements will be enormous. Even now it is stated that the A 67 will have to get an additional carriage-way, as it will not be adequate enough to cope with the flow of the transportation of goods. The plans can be read in detail in the starting note MER: <http://www.limburg.nl/upload/pdf/StartnotitieMerGreenportlane221107.pdf> and <http://www.behouddeparel.nl/cmsdata/files/Klavertje%204%20-%20Ruimtelijk%20ontwerp%20-%20whole%20Package.pdf> (more recent adaptation)

- The agricultural development area (LOG) of Witveld in the municipality of Horst aan de Maas (which is planned to give room to a chicken-farm with 1,200,000 (!) chickens and a pig-farm with 35,000 pigs, a butchery and a dung fermentation installation – all companies together forming the New Mixed Farming Company ('NGB')). The establishment conditions put up by the municipality of Horst aan de Maas with regard to the 'LOG' Witveld allow the settlement of 6 companies, with building-blocks that enable not one but six companies comparable with the 'NGB' to settle.

Especially the inhabitants of Grubbenvorst object strongly to these developments. Professor Dr. Peter Groot Koerkamp (professor in the University of Wageningen) has stated in his objections concerning the production of particulates as a result of the 'NGB' that the so-called 'air-washers' which are available at the moment do not have the capacity to prevent the discharge adequately.<sup>7</sup>

Furthermore a calculation by the Society of Preservation of the Pearl with regard to the number of transport movements concerning the 'NGB' shows that this number will surpass 12,000 a year. The initiations of the 'NGB' did not contradict this conclusion. The inhabitants of Grubbenvorst fear the expected inconvenience and health damage.

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<sup>6</sup> The number of transport movements at the moment lies around 1500 lorries/cars a day. Looking at the plans this number will increase considerably in future.

<sup>7</sup> Mr Groot Koerkamp assumes that with modern technology a reduction of particulates of 60 % can be achieved. As far as poultry is concerned one cannot be so sure (from a hearing: 'There is hardly any experience so far with reduction of emission of particulates.') With the production of 83,000 kilos of particulate matter a reduction will result in a discharge of approximately 33,000 kilos of particulate matter per year. This calculation only involves the poultry farm !

An investigation by Blonk Environmental Advisors – by order of the municipality of Horst aan de Maas – shows that the ‘NGB’ will produce an emission of ammonia of 60 tons. The area of Witveld where this ‘NGB’ has been planned already has an ammonia ‘production’ of around 40 tons ( see appendix 5, data municipality of Horst). Ammonia contributes to PM<sub>2.5</sub> which is insufficiently discussed in the inquiry directory.

Furthermore we need to consider the (calculated) emission of particulates of around 6,000 kilos (see appendix 6). In principle 6 building blocks of 6 hectares each will be allowed within the ‘LOG’ Witveld. Each building Block on its own can contain a company the size of the ‘NGB’. Talking about discharge this means that by fully exploiting the opportunities of the ‘LOG’ Witveld you end up with 6 x 33,000 kilos = 198,000 kilos of particulate matter. This example evidently shows that not taking into account the intensive stock farming companies will present an enormous void, to the population’s disadvantage. We regard your attitude in this matter as blameworthy, the more so as you are well aware of the situation. After all questions have been asked in the Second Chamber about this project (see appendix 7: letter Board of directors Regional Affairs, feature DRZZ 2008/2710 August 14<sup>th</sup> 2008<sup>8</sup>).

Moreover the sector itself has pointed out that the goals concerning the reduction of particulates and ammonia will not be achieved (see appendix 8).

Mr Smeets (Alterra) – an expert in this field – has stated on several occasions that with the current plans the position of Grubbenvorst resembles that of a large industrial area, which to his opinion is a very undesirable situation. That is why he has suggested to arrange the entire area north of Venlo as a super agricultural park and to move the village of Grubbenvorst as a whole. This of course is the world turned upside down, but it does make clear the urgency of the matter.

- The municipality of Sevenum, future merger municipality of Horst aan de Maas, has also assigned Agricultural Development Areas. The ‘Groengroep Sevenum’ is deeply worried about the developments concerning intensive stock farming in their village.<sup>9</sup>
- The planned sand extraction and the accessory harbour and sand processing installation along the River Maas in Grubbenvorst.

The Environmental Effects Report (‘MER’) for this project has not yet been determined so that the total production of particulates with the sand processing installation as a source cannot be indicated yet. This much is clear though: the increase of the number of transport movements and the amount of ensuing particulates will be in itself enormous. The government has been informed on this development (see appendix 9, the letter by the Ministry of Transport and Public Works, October 2008, RWS/SDG/NW2008/1147/69676).

- The present extraction of sand (and the accessory sand processing installation) in the municipality of Arcen.
- The growth of Airport Weeze, just across the German border, which is currently quite substantial. Other airports are being taken into account though.

Ever since the introduction of the air tax this airport is expanding remarkably.

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<sup>8</sup> In the letter an answer is given to the demand of a guarantee that the health of the inhabitants of Grubbenvorst will not suffer under the installation of this chicken farm: *A poultry farm will bring along emissions of matters like particulates. In the environmental permit rules can be set up in order to prevent negative effects caused by these emissions or, in case this is not possible, to restrict the effects as much as possible. The guarantee that was asked for cannot be given because it is impossible to exclude every single effect. Naturally this means that also in this situation the valid rules apply unabridged, for the protection of the inhabitants, and need to be maintained.*

<sup>9</sup> <http://www.groengroepsevenum.nl/>

Apart from the Ruhr area in Germany, the ports of Antwerp and Rotterdam – which affect the air quality of our province of Limburg – we seriously believe that the airport of Weeze needs to be taken into account in the Inquiry Directory NSL. After all particulates don't recognize borders (see appendix 10 and 11, taken from the 'Limburger' – articles about Airport Weeze).

- Requests to start intensive stock farming companies ( in Horst aan de Maas, such as Willems Beheer in America and Ashorst in Veld-Oostenrijk – both companies situated outside an Agricultural Development Area !). As soon as the resolution to decontrol animal rights is implemented around the year 2013 North Limburg will face an even worse quantity of particulates emanating from intensive stock farming.

It is vital to map out this development and to anticipate on it as far as air quality is concerned. It is wrong to suggest that decontrolling animal rights only involves ammonia (after all it contributes to PM<sub>2.5</sub>), which is what Mrs Verburg states in Second Chamber document 31478. Decontrolling animal rights will also highly contribute to the production of particulates! That is why we support the thesis that the intensive stock farming must be taken into account.

- The railway yard in Venlo has been a source of discussion and annoyance for years. This will flare up with the arrival of Greenport Venlo. The displacement of the yard towards Tradeport has been under discussion for many years. And rightly so, as its current position in the heart of Venlo is extremely awkward. In view of further developments in the transport branch the consequences for the air quality need to be considered thoroughly in connection with the possible displacement of this yard.

Plans which are featured are:

- Tradeport North and Park Zaarderheiken

With regards to Tradeport North an estimate can be made of the negative influence on air quality. As far as the Floriade – taking place in 2012 – is concerned it can be said that the grounds accommodating this world exhibition will be changed into an Industrial area afterwards. While the Floriade takes place the region will be confronted for a year with an enormously negative influence due to the stream of tourists which is expected (in the most pessimistic scenario – from the business point of view – they reckon with 2 million visitors, but they hope to surpass this number). Also the planned buildings – especially offices – contribute to the negative development in the air quality after the Floriade is over.

- Greenhouses.

In the greenhouse projects of 'Californië' and 'Siberië' the use of heat power plants is taken as the starting point. But as yet the companies appear to be dependent upon traditional energy sources, mainly gas. Heating the greenhouses, but also the heat power plants (if they can be employed) has a negative effect on the air quality. In case of extension of greenhouse companies it would be advisable to equip them with global heat systems, which are more eco-friendly.

- Construction of the A 74, a motorway straight through a residential area ! See point 4.
- The problem with the intensive stock farming in Meerlo/Wanssum (see appendix Limburg Doc. 15; page 26, Table 5.5 'Inspraakwijzer NSL' Overall survey of the number of transgressions per municipality). These companies are very likely to expand in the future.

Actually an overall integral Environmental Effect Report should be set up including all projects around Venlo. Repeatedly the Society for the Preservation of the Pearl has insisted on such a report with both the municipality of Horst aan de Maas and the province of Limburg.

Concerning all these projects – that all together deteriorate the air quality substantially – a group of approximately 50 general practitioners and other medical doctors from the region of Noord-Limburg has presented a petition to the municipality of Horst aan de Maas. They are deeply concerned about the health risks of all the mentioned projects together (appendix 12).

*Ad 6. Insufficient consideration of the consequences of intensive stock farming for the air quality.*

The intensive stock farming already causes 20% of the emissions of particulates and besides it is also a source of unacceptable emissions of ammonia. At the same time an unprecedented scaling-up of the extensive stock farming is imminent. The unforeseen expansion of the intensive stock farming – unforeseen at the time of the development of the reconstruction legislation – leads to the justified assumption of higher emissions of PM<sub>10</sub> and PM<sub>2.5</sub> than anticipated. In the inquiry directory the problems are concentrated on approximately 300 poultry farms. Actually the problematic nature is much larger and wider. The future mega-sized pig farms will also contribute heavily to the problems of particulates. In: “*Emissies veehouderij en luchtwassers, Hoorzitting 16 juni 2008, Zwolle, Prof. Peter W.G. Groot Koerkamp, Hoogleraar Agrarische Bedrijfstechnologie*” Professor Dr Groot Koerkamp points to several problems in this field that have by no means been solved, whereas at the same time the decontrolling of animal rights around the year 2013 is already being discussed. Looking at the present technology and the increase of intensive stock-breeding in certain areas (like Noord-Limburg) as a result of that, the effects on the quality of the air will be severe. With all the negative consequences ensuing, especially first of all for the people living close by. The fact that all IPPC-compulsory companies should already have complied to the BBT demands, which they do not at the moment (see point 3), is food for thought, also in relation to the free animal rights around the year 2013. In Second Chamber document 31 478 Durability of intensive stock farming<sup>10</sup>, August 22nd 2008, these free animal rights are discussed further.

*Ad 7. Raising the standard ‘niet in betekende mate’ (NIBM) from 1%- to 3 %- regulation<sup>11</sup>*

Raising the NIBM standard relates mainly to particulates PM<sub>10</sub> and NO<sub>2</sub>. The resolution gives way to numerous (small) new sources, thus putting the policy ambitions in arrears significantly. On a local level public health is hard pressed. Looking at the Resolution of Collective Prevention Public Health and the treaty of Århus<sup>12</sup> we believe this is a matter of ‘improper rule’.

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<sup>10</sup> Question: *Is the Government audit office aware of the fact that momentarily free animal rights are being given to a.o. mega-sized farm owners, provided that the overall emissions do not increase?*

Answer: *Yes, we are aware of that..*

Question: *How does the Government audit office judge the supply of free animal rights in view of the effectiveness of the Regulation Termination Stock Farming?*

Answer: *The condition attached to the free supply of animal rights states that the emissions of ammonia in the relating stock-farm must not increase. Therefore this new policy will not affect the current emissions of ammonia. It is for that reason that the topic was not involved in our investigation.*

<sup>11</sup> Interim period: 1% standard:

The 3% standard applies to resolutions, that are made on the moment the NSL has been assessed permanently and come into force (see article 2, paragraph 2, Resolution NIBM). In the interim period, lasting until the coming into force of the NSL, the lower standard of 1% applies. This is equal to an increase of 0.4 microgram/m<sup>3</sup> at the most for both PM<sub>10</sub> and NO<sub>2</sub>. The systematics for determining whether a project is NIBM or not will remain the same after the coming into force of the NSL.

<sup>12</sup> “*Acknowledging everybody’s right to live in an environment that is appropriate to his or her health and well-being and has the obligation, both individually and together with others, to protect and improve the environment in the interest of present and future generations*”.



The consequence of raising the standard is that all projects in the Region of Venlo – were they to be judged separately – fall outside the 1 % standard but would fall within the 3 % standard. Judging all projects together would definitely lead to the conclusion that we are dealing with ‘in betekende mate’ (IBM)<sup>13</sup>.

*Ad 8. Not taking into account the industrial areas in calculations regarding air quality.*

As shown in point 5, the Region of Venlo is confronted with many projects, like the development of (new) industrial areas (beside the present ones), such as Trade Port North and – after 2012 – the Floriade grounds after the transition into industrial area. Actually the expansion of the auctions and the adjoining terrain of commerce also means an extension of a (logistic) industrial area. These are not taken into account.

On page 31, Government viewpoint, you write: ‘The NIBM Regulation does not contain a standard numberwise for industrial areas. Namely the effect of industrial areas on the air quality is highly dependent on its concrete function. It depends on the type of company, the discharge, if any, of polluting matter by those companies themselves and the traffic they generate.

In our opinion it is very well possible to determine the air quality for this type of areas. For example Overijssel has asked for the ‘Air quality investigation regional industrial area Twente in Almelo XL Businesspark Twente’<sup>14</sup>. This research shows that there are transgressions and also it becomes obvious that it is possible to examine the air quality of industrial areas.

*Ad 9. Integral approach*

The need for good quality of air is not just restricted to man, but also important for the vegetable and animal world. A limited – ‘man-focused’ – view would wrong other forms of life on earth and – indirectly – man himself as well !

Reaching a conclusion we state that the inquiry directory “Inspraakwijzer voor het Nationaal Samenwerkingsprogramma Luchtkwaliteit” lacks the (environmental) information mentioned above and that problems are being treated as of little importance. This is why we think this inquiry directory is contrary to the treaty of Århus and must be revised with more far-reaching demands concerning air quality.

In view of the preceding conclusion we also send this letter to the European Community requesting the EU to reject the mentioned inquiry directory NSL and rebuke the Netherlands for seriously endangering its population.

André Vollenberg

Chairman Society for the Preservation of the Pearl  
Grubbenvorst

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<sup>13</sup> From NSL, Government viewpoint page 31: “This standard of 3% is linked to the working of the NSL. For the effect of the NSL-measures is so big that the limits will also be achieved if projects under this 3 %-standard are not compensated separately for their effect on the air quality.”

<sup>14</sup> <http://provincie.overijssel.nl/contents/pages/6749/def.rapportluchtkwaliteit20november2006.pdf>

## Appendix:

1. Letter by lung specialist Lukker
2. Editorial from NRC, concerning 'professional complainers'
3. Topographical map, all projects shown by Google Earth
4. Map of new exit in the area of the auction buildings / Greenportlane
5. Current overall emission of ammonia in agricultural development area (LOG) Witveld
6. Calculation of current emission of particulates in LOG Witveld
7. Questions from the Dutch Second chamber about the erection of a mega chicken farm in Grubbenvorst
8. Report from the sector of poultry farming
9. Letter by Huizinga concerning processing sand
10. Newspaper article concerning airport Weeze
11. Newspaper article concerning airport Weeze
12. Petition by medical doctors and general practitioners (part 1 is not available, but will be redirected as soon as possible)