

The item should be discussed on 7 January 2008STATEMENT TO THE MINISTRY OF THE ENVIRONMENT ON THE MID-TERM
REPORT OF THE ENVIRONMENTAL IMPACT ASSESSMENT PROGRAMME
"RUSSIA-GERMANY OFFSHORE NATURAL GAS PIPELINE IN THE
EXCLUSIVE ECONOMIC ZONE OF FINLAND"

City Board 2006-2538

The Ministry of the Environment reserved (on 16 November 2007) to the City of Helsinki, among others, the opportunity to issue a statement on the mid-term report of the environmental impact assessment programme "Russia-Germany Offshore Natural Gas Pipeline in the Exclusive Economic Zone of Finland" by 21 December 2007.

The Deputy Mayor (Public Works and Environmental Affairs) states that Nord Stream AG, which is planning the offshore natural gas pipeline in the Baltic Sea, has specified the alignment alternatives that are being investigated in the environmental impact assessment (EIA) procedure. The company has prepared a mid-term report on these changes, which has been submitted for statements to all States of the Baltic Sea. The Finnish authorities and people also have the opportunity to give their opinion on the mid-term report insofar as the environmental impacts can be considered to extend to Finland. Spanning approximately 1,200 kilometres, the natural gas pipeline travels 369 kilometres in the Finnish EEZ. The mean depth of the pipeline corridor in the Gulf of Finland is 70 metres.

The opinions and statements issued will be submitted to Nord Stream and to Germany, Denmark, Sweden and Russia for consideration in the EIA procedure. The deadline in Finland for submitting an answer is 18 January 2008. The results of the assessment will be compiled into an environmental impact assessment report, which will subsequently be submitted for a public hearing, and separate notice will be given of its status. Nord Stream's estimate for the completion of the assessment report is April 2008.

The mid-term report on the current status of the pipeline is appended to this statement. The Finnish version can also be read on the Internet at www.ymparisto.fi/kansainvalinenYVA (> Venäjän ja Saksan välinen merenalainen maakaasuputki > Väliraportti). More information on the project is available on Nord Stream AG's website at www.nord-stream.com.

On 22 January 2007 (Article 112), the City Board issued a statement to the Uusimaa Regional Environment Centre on the environmental impact assessment programme "Russia-Germany Offshore Natural Gas Pipeline in the Exclusive Economic Zone of Finland" (Appendix).

The Environmental Committee states (on 11 December 2007), *inter alia*, the following:

The company has changed the pipeline alignment in Denmark around Bornholm to the north and west of the island because of a nearby dumping and risk area for chemical munitions. In Sweden, the route travelling south of Gotland has been specified by taking into consideration the nearby Natura 2000 area, dumping and risk areas for chemical munitions, the mine risk and shipping lanes in the alignment.

In planning the alignment through Germany, the Natura 2000 areas and the planned and approved wind farms have been taken into consideration. Another landfall location for the pipeline has also been investigated in Germany.

In terms of the environment, the Finnish authorities have found it important that Nord Stream also investigate the pipeline alignment south of Gogland, so that the environmental impacts of this alternative could be included in the EIA of the project. The Ministry of the Environment has suggested an expert meeting between Finland and Russia. The Russian Ministry of Natural Resources has given a positive response to Finland's suggestion on studying the alternatives, but it has not yet confirmed its position on launching an investigation where the Gogland alternative would be included in the EIA report.

Statement of the Environmental Committee

In its statement issued on 12 December 2006 on the environmental impact assessment programme of the offshore natural gas pipeline, the Environmental Committee stated that the assessment programme for this major project was clear but general. The mid-term report shows that the assessment programme has been specified and active efforts have been made to carry out the additional studies suggested in the statements. The Finnish Institute of Marine Research has also been actively involved in the studies.

Of the possible environmental impacts related to the construction of the Nord Stream, the impact parameters and the environmental parameters affected have been identified. The Environmental Committee stresses that the environmental impacts of construction, operation and de-commissioning of the equipment should be separately discussed in the assessment report.

The mid-term report states that in the context of the EIA, special emphasis will be given to possible disturbances of the seabed as a result of seabed intervention (trenching, dredging, rock dumping) and to issues related to chemical and conventional ammunition. In the view of the Environmental Committee, it is important that HELCOM's guidelines be followed both in sampling and during the possible construction. Essential parts of the assessment procedure also include the identification of risks and uncertainties and the careful planning of monitoring the construction and operation of the project.

The Economic and Planning Centre has (on 14 December 2007) nothing to state in the matter.

The Technical Committee states (on 18 December 2007), *inter alia*, that it issued a statement on the EIA programme of the project on 19 December 2006. It highlighted that the electric cable connection between Estonia and Finland should be taken into consideration in the construction and operation of the pipeline.

The optimisation of the Nord Stream pipeline route in the Gulf of Finland was limited to the Finnish EEZ after Estonia rejected the company's request to investigate a southern route, more even. A large number of free spans will result in sea bed intervention work at numerous points through the dumping of rock berms. The impacts have been estimated to reach 1 km on each side of the pipeline, but significant adverse environmental impacts are not foreseen. In the current optimised route, the needed amount of rock is 0.1 million m³ per pipeline instead of the original more than 1.2 million m³. To avoid the Natura areas, the Finnish authorities have further requested the investigation of a more southern route.

Impacts during the pipeline installation phase include supply vessel and helicopter traffic, the risk of an oil spill, the impacts of pipe-lay and rock dumping on the seabed and fauna, the risk of dumped munitions, and the impacts of fuel consumption on air quality and the climate. Cable crossings will be taken into consideration in the project. If the pipeline construction base is located in Finland, there will be local impacts and impacts on traffic.

Helsinki Energy issues the following statement on the matter:

Natural gas accounts for more than half of Helsinki Energy's fuel consumption. Natural gas is transported from Russia to Finland through the pipeline constructed on the Karelian Isthmus. The natural gas pipeline that will possibly be constructed between Estonia and Finland at a later date would cross the Nord Stream pipeline.

Helsinki Energy is involved in the electric cable connection between Estonia and Finland. New cable connections will possibly be built in the future. The construction and operation of the natural gas pipeline between Russia and Germany should be implemented in such a manner that cables are not harmed and their operation or subsequent construction are not jeopardised.

Helsinki Energy also reserves the opportunity to issue a statement on the content of the future assessment report.

In its statement issued on 12 December 2006 on the environmental impact assessment programme of the natural gas pipeline, **the Rescue Committee** stated that it had nothing to comment on the matter.

The Rescue Department states (on 18 December 2007) that its opinion is unchanged from its previous statement.

The Port Committee states (on 18 December 2007) that it issued a statement in December 2006 on the environmental impact assessment report of the offshore pipeline between Russia and Germany in the Finnish EEZ. The mid-term report does not include any new impacts associated with the actual port activities in Helsinki, and there is nothing new to add to the statement of the Port Committee in December 2006.

The Deputy Mayor (Public Works and Environmental Affairs) refers to the statements issued.

DEPUTY MAYOR (PUBLIC WORKS AND ENVIRONMENTAL AFFAIRS)

The City Board will probably decide to submit to the Uusimaa Regional Environment Centre the following statement on the mid-term report of the environmental impact assessment programme "Russia-Germany Offshore Natural Gas Pipeline in the Exclusive Economic Zone of Finland":

The City Board welcomes the fact that the environmental impact assessment programme of the Russia-Germany offshore natural gas pipeline has been specified and active efforts have been made to carry out the additional studies suggested in the statements on the assessment programme. The City Board considers that the environmental impacts of construction, operation and de-commissioning of the equipment should still be separately discussed in the environmental impact assessment report to be drawn up subsequently during the second phase of the EIA procedure.

The mid-term report states that in the context of the EIA special emphasis will be given to possible disturbances of the seabed as a result of seabed intervention

(trenching, dredging, rock dumping) and to issues related to chemical and conventional ammunition. The City Board finds it important that the guidelines of the Baltic Marine Environment Protection Commission (HELCOM) be followed both in sampling and during the possible construction. Essential parts of the assessment procedure also include the identification of risks and uncertainties and the careful planning of monitoring of the construction and operation of the project.

An electric cable, which the City of Helsinki also utilises, has been constructed between Estonia and Finland. New cable connections may also be built in the future. Indeed, the City Board considers that the construction and operation of the natural gas pipeline between Russia and Germany should be implemented in such a manner that cables are not harmed and their operation or subsequent construction are not jeopardised.

Letter to the Ministry of the Environment and excerpt from the minutes to the Environmental Committee, the Rescue Committee, the Technical Committee, the Port Committee and the Economic and Planning Centre.

Further information:

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APPENDICES

Appendix 1 Mid-term report – Status of the Nord Stream pipeline route in the Baltic Sea

Appendix 2 Statement of the City Board dated 22 January 2007