

## **Estonian Ministry of Foreign Affairs**

Mr Harry Liiv  
Deputy Secretary General  
Ministry of the Environment  
Narva mnt 7A  
15172 TALLINN

You: 07.12.2007 nr 13-3-1/57953  
Us: 21.12.2007 nr 8/5574

### **The possible location of the planned Nord Stream gas pipeline in the Baltic Sea**

Dear Mr Liiv

In response to your letter of 7<sup>th</sup> December 2007 regarding the information about the project presented by Nord Stream AG from October 2007 (hereinafter *review*) the Ministry of Foreign Affairs wishes to comment as follows.

1. The review cannot be assessed accurately because the developer has not included the planned alternative coordinates for the pipeline in the documentation. The developer must provide clear coordinates of the considered alternatives. The absence of these coordinates precludes from assessing the environmental effects of this pipeline location and also the extent of necessary measures by the governments of the countries of origin and affected countries. It is also not possible to assess if the gas pipeline construction or location in the Finnish or Swedish exclusive economic zone will cause limitations for the use of Estonia's exclusive economic zone and what these limitations might be.
2. In the review, different alternatives for the gas pipeline are marked with abbreviations such as C4.0 or C9.0 and their coordinates are not specified. In addition they, are not marked appropriately.
3. In the sub-item 4.1 of the review, the opinion of the Finland Ministry of Trade and Industry from 11<sup>th</sup> January 2007 is referred to which deals with the alternatives for the pipeline. We draw attention to the fact that this review considers southern alternatives of the gas pipeline on the mainland. It is regrettable that the developer has represented the alternative mainland recommendations misleadingly and in the environmental impact assessment, has not taken into consideration the alternatives on the mainland suggested by several countries. It is also unclear whether the developer has given enough attention to the fact that the planned pipeline will pass through a shipping route with heavy traffic.
4. The argument in the third paragraph of sub-item 4.1 that prior to submitting the request for research to Estonia, the alternative options of the pipeline were discussed with the government authorities of Estonia, is incorrect. We feel it is important that Nord Stream AG avoids the use of misleading information.
5. Also incorrect is the Table 4-1 on the 7<sup>th</sup> page of the review - information about Estonia's water research needs to be corrected. Estonia refused permission for

research inside our exclusive economic zone based on the application presented on 31<sup>st</sup> May 2007.

6. We request an assessment from the Ministry of the Environment whether the timetable for presenting an environmental impact assessment report is correct in Chapter 7 of the review.
7. The Ministry of Foreign Affairs would also like to point out again the poor quality of the Estonian translation of the cross-border environmental impact assessment programme project documentation.

Yours Sincerely,

*(Signature)*

Matti Maasikas  
Secretary General

Avo Suurthal 637 7170  
Mati Murd 637 7200  
Kristi Land 637 7400