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Response to the "Status of the Nord Stream pipeline route in the Baltic Sea" information document

Estonian Ministry of the Environment has received appropriate letters and the additional project information document "Status of the Nord Stream pipeline route in the Baltic Sea" from all of the parties of origin in Nord Stream project environmental impact assessment (EIA). We are grateful for the sent materials and welcome fluent international cooperation.

According to the introduction chapter of the mentioned document, it was designed to supplement Nord Stream Project Information Document (PID) from November 2006. Bearing in mind the supplementary nature of the document as well as its limited granularity and novelty, we decided not to repeat the full publicising procedure that was done with the initial PID in 2006.

Although we intentionally didn't organize public hearings on the issue, we highly value public participation and public supply with up to date information. In order to inform our public and interested persons, we uploaded the document to our website for viewing, downloading and commenting. Additionally we involved a list of authorities and organizations to whom we addressed the issue personally. As a respond to our initiative, we received comments and statements from Ministry of Foreign Affairs, Ministry of Economic Affairs and Communications, Ministry of Social Affairs, Estonian Maritime Administration, Estonian Rescue Board, Commission for Nature Conservation of the Estonian Academy of Sciences. The position of the last person in the list is also supported by the Estonian Council of Environmental NGOs, who have submitted appropriate statement to us.

Although the statements are partly covering issues that should be raised during the discussion of the EIA report, we believe they should still be taken into account at the phase where report is still under compilation. All the mentioned statements are electronically available at the webpage address www.envir.ee/311433. In order to reduce the burden to natural resources, we kindly ask you to download the electronic copies of the documents and use them in the further developments.

We share the majority of concerns announced to the Ministry of the Environment. Binding our own position with the formulated opinions about Nord Stream pipeline and the submitted route status paper, we would like to highlight and ask you to take into account the following:

- Possible onshore alternatives of the pipeline are not represented and are excluded from the list of options without clear justification. We respect the developers opportunity to draw up and design projects favorable to them, but still we see a need for justification at least from the environmental point of view;
- The list of possible impacts should be revised and if necessary enlarged. Beside impacts to the marine ecosystems the impacts to human health and social welfare have to be defined more deeply;
- Construction and exploitation of the gas pipeline causes environmental damage, which detailed description we expect to find in EIA report. Depending on the pipeline route alternatives, we consider it essential to have in parallel a precise description of proportionate remedial measures which developer is foreseeing for the future;
- In order to avoid vain and unfruitful discussions in the future, we emphasize the need to have relevant research information available together with the EIA report documentation.

A quite noteworthy remark, which we unfortunately have to agree with, was given also about the poor use of language and translation of the document. We kindly ask you to strive to better translation in EIA report, to avoid the unnecessary confusion we saw with previously submitted document, were English language version had to be treated as dictionary to Estonian version.

Sincerely



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