

SOUTHEAST FINLAND REGIONAL ENVIRONMENT CENTRE

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Matter

**RUSSIA-GERMANY OFFSHORE NATURAL GAS PIPELINE IN THE
EXCLUSIVE ECONOMIC ZONE OF FINLAND – MID-TERM REPORT OF THE
ENVIRONMENTAL IMPACT ASSESSMENT PROGRAMME**

The Nord Stream project covers a planned natural gas transmission pipeline system spanning approximately 1,200 kilometres from Russia to Germany through the Baltic Sea. According to the plan, the transmission system will travel across the Baltic Sea within the territorial waters of Russia and Germany and the Exclusive Economic Zones of Finland, Sweden and Denmark. The pipeline travels 369 kilometres within the Finnish EEZ. The transmission system consists of two parallel natural gas pipelines and a sea-level service platform to be built off the coast of Gotland.

Nord Stream AG, which is planning the offshore natural gas pipeline in the Baltic Sea, has specified the EIA procedure. The company has prepared a mid-term report of these changes, which has been submitted for statements to the States of the Baltic Sea.

The Southeast Finland Regional Environment Centre submitted earlier the following statement on the environmental impact assessment programme for the project:

According to the EIA programme, the assessment procedure examines one pipeline alternative in addition to the non-implementation of the project (VE 0): a natural gas transmission system consisting of two pipelines from Vyborg across the Baltic Sea to Greifswald in Germany in accordance with the Nord Stream project plan. The creation of alternatives and the comparison of the various project implementation options are an essential part of the EIA procedure and it would be good if the environmental impact assessment also included and explored the possible project options and/or alternative pipeline alignments within the proposed alignment corridor. The assessment report should also indicate the grounds on the basis of which the alternatives explored in the feasibility study phase have been eliminated from the assessment programme.

The delimitation of the project survey area and impact area, as proposed in the environmental impact assessment programme, is appropriate. The project will have direct and indirect environmental impacts of various types, which are limited in different ways. The size of the impact area, as well as the targeting of the impacts, will vary for the various impacts. Impacts are targeted at the environment/its sectors in a different manner near the coast, in shallow areas and in the vicinity of environmentally sensitive areas compared to deeper marine areas.

As such, the environmental impact assessment programme has managed to identify the key and most significant impacts of the project systematically and also in a rather comprehensive manner.

Impacts during the construction of the transmission system play a key role (cf. impacts on the seabed, water quality, various organisms, etc.). In the Gulf of Finland, the geological conditions of the seabed and its topography constitute a challenge to the construction of the pipeline (cf. the use of an excavation technique that best suits the geological conditions of the seabed). In addition, dredging, excavation and seabed intervention impact on the seabed sediments and their spreading. Areas with traditional or chemical ammunition/waste on the seabed are a special issue.

The assessment report should discuss the environmental impacts of potential incidents (accidents, etc.) (for example, the emissions and impacts of gas or its combustion products) and the measures taken because of/in preparation for these incidents.

The impacts of the project on the natural environment and the underwater environment should be established in order to provide an adequate view of the impacts of the project on biodiversity in the immediate vicinity of the project area and for the areas of the Natura 2000 network within its influence, other protection areas/sites and key natural values.

With regard to the pre-commissioning of the transmission system, particular attention should be paid to the selection of the place for the discharge of the water used in pressure testing and to the minimisation of the environmental impacts of the discharge.

The assessment report should clearly indicate the assessment methods used in the environmental impact assessment and the related assumptions, as well as to what extent the analysis was based on calculational factors, model calculations, literature or the surveys/studies made.

According to the present mid-term report, Nord Stream has mapped all relevant areas that may be of importance to the public and the environment, like nature

protection areas, shipping lanes, areas valuable to tourism, spoil grounds, munitions dump sites and fishing grounds. These considerations are used to further optimise the pipeline route. Nord Stream has also undertaken geophysical offshore surveys to confirm new optimised routes. A sampling programme is also launched to investigate the existing conditions in areas where seabed intervention is expected to take place. The purpose of the surveys is to provide the necessary baseline information for the environmental impact assessment in areas where seabed intervention is foreseen. Additional field investigations have been contracted to FIMR (Finland) SGU (Sweden) and DHI (Denmark), which comprise investigations of offshore sediment, marine flora and fauna and birds in areas where potential environmental impacts may occur.

The studies mentioned above are necessary and their results should be utilised and taken into account in route optimisation. Nord Stream has been optimising the route in the Finnish EEZ in order to significantly reduce the amount of intervention works (Route C9). The main intervention method is rock dumping by building up rock berms for pipeline support. In the conceptual study route, the needed amount of rock is approximately 1.2 million m³ per pipeline. In the optimised route, the number of free spans has been reduced and the needed amount of rock is approximately 0.1 million m³. The use of adjoining rock from building stone quarrying for this purpose is a matter for consideration in further planning.

The Finnish authorities previously applied for permission to survey a more southern route in the Estonian territorial waters, but the Estonian Ministry for Foreign Affairs rejected Nord Stream's application on 26 September 2007 and the further development of the route in Estonia has consequently been abandoned. Even though a certain drawback in terms of the EIA, this is a reality that impacts on the further planning of the project and contributes to the importance of route optimisation and the possible alignment alternatives in the Finnish EEZ. Apart from the earlier statement and the facts presented in the present mid-term report, the Regional Environment Centre has nothing particular to add to the matter.

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