

21 December 2007

531-61342-06

1200-001

Our ref.  
Environment Department  
Water Section  
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SEPA  
Att.: Inger Alness  
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**Statement of opinion on supplementary documentation for  
Environmental Impact Assessment for Nord Stream Gas Pipeline,  
ref.: 121-7846-06**

**THE CASE**

Nord Stream AG is planning to lay a gas pipeline between Vyborg in Russia to [*sic*] Greifswald in Germany. The pipeline will, as well as the water territories of Russia and Germany, be laid within the economic zones of Finland, Sweden, Denmark. According to the Espoo Convention on environmental impact assessments in transboundary contexts, a country within which an activity is planned which may cause significant environmental impact in another country must inform the affected country concerned. This notification brings with it the opportunity to participate in the process of drawing up an Environmental Impact Assessment. Permission for the construction of the pipeline is required in accordance with the legislation of each respective country. In the course of testing in regard to this, an Environmental Impact Assessment must be drawn up in accordance with the regulations in place in each country. Nord Stream AG has drawn up documentation to initiate procedures in the five countries affected.

The project, in regard to the laying of the pipeline, will in Sweden be tested under the Swedish Continental Shelf Act (*lag (1966:314) om kontinentalsockeln*). Nord Stream AG must hold consultations in Sweden on the project Environmental Impact Assessment before the testing which must take place under Swedish law.

Under the Ordinance on Environmental Impact Assessments (*förordningen (1998:905) om miljökonsekvensbeskrivningar*), the Swedish Environmental Protection Agency is the authority responsible for giving and receiving notifications and otherwise fulfilling the obligations incumbent for Environmental Impact Assessments in transboundary contexts. The SEPA has, in this capacity, given a long list of authorities, including the County Administrative Board of Skåne County, as well as organisations and the public, the opportunity of giving their opinions on what should be contained in the Environmental Impact Assessment for the project.

The County Administrative Board has previously, namely in January 2007, been offered the opportunity of giving its opinions on what the Environmental Impact Assessment should address. Because Nord Stream AG has now made some changes to the pipeline route as previously announced, the SEPA has sent out documentation for a further referral for consultation.

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**OPINIONS OF THE COUNTY ADMINISTRATIVE BOARD**

The County Administrative Board notes that the altered route means that the pipeline will be placed between the south eastern coast of Skåne and Bornholm. Here, the pipeline will be laid in Danish territorial waters, but the fishing waters in this area are shared between Denmark and Sweden. Swedish (Scanian) fisheries may therefore be affected by the planned gas pipeline. There is large-scale trawl fishing in the area concerned today. According to Nord Stream AG, the pipeline will not prevent trawl fishing, and trawling will be permitted over and around the pipeline. However, it emerged during the seminar arranged by Nord Stream at Malmö on 30 November, with the participation of the affected authorities and the representatives of the Danish and Swedish fishing industries, that trawling should be done in observance of a certain minimum angle to the pipeline in order to minimise the risk of catching and damaging the pipeline. In the North Sea, there has been an accident in which a Scottish trawler sank after its trawl nets caught on a gas pipeline. The County Administrative Board therefore considers that the consequences for the fishing industry should be carefully evaluated in the Environmental Impact Assessment. This should for instance consider loss of catch, increased navigation times for fishing vessels and, especially, the risk of accidents and damage to the pipeline in connection with trawl fishing. Likewise, a quantification should be given of catch losses during the construction phase.

Shipping traffic is heavy in this area, with the most important shipping lanes, the HELCOM lane and the trunk lane for vessels entering or leaving the Baltic passing this point. The location of the gas pipeline in this area may entail a raised risk of accidents, both during the construction phase and the operational phase. It is therefore important that this is illustrated thoroughly in the Environmental Impact Assessment, along with measures to minimise these risks.

**Other opinions:**

- Nord Stream AG should, together with fisheries organisations and authorities in affected countries, set up a network, organisation or similar to issue information simply and directly regarding the construction work and repairs and maintenance to the gas pipeline. This organisation might resemble the organisation today known as FOGA (Fishermen's Information about Oil and Gas Activities), present today in Denmark providing communication between Danish fishermen and the oil and gas companies which own the pipelines, and which covers fisheries in the Danish sector of the North Sea.
- There should be a system for incident reporting. Such information should be public, so that it is possible effectively to prevent future accidents.

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- A monitoring programme for the operation should include continuous checking to ensure that there is no old fishing equipment caught underneath or by the pipeline, which might contribute to more equipment being damaged or catching.
- In its Environmental Impact Assessment, Nord Stream AG should show how it intends to proceed in order to minimise the risks of accidents involving ships and fishing boats in the area around the gas pipeline.
- In regard to financial compensation for lost equipment caught on the pipeline, Nord Stream AG should as soon as possible set up a fund in collaboration with the boards of fisheries in Sweden and Denmark. There is much knowledge and experience to be gleaned here from similar collaborations in the North Sea.
- A complete Risk & Vulnerability Analysis, RSA, on events that might occur during the entire life span of the pipeline should be presented. Aspects of risk and security/safety in all respects should be clearly investigated in collaboration with the countries concerned. An investigation should be conducted as to what accident prevention and/or damage limitation measures are necessary and will be carried out.

The County Administrative Board also wishes to point out that the gas pipeline will be laid through an area near the Södra Midsjöbanken, which the Southern Swedish County Administrative Boards are proposing should be further investigated in regard to its suitability for maritime wind power (see the study *Sydhavsvind*, 'Wind in the South Sea', which can be downloaded from: [www.m.lst.se](http://www.m.lst.se)). This should be considered in the Environmental Impact Assessment.

The County Administrative Board also notes with regret, particularly in consideration of the agreements reached at the United Nations Climate Conference on Bali, that this new gas pipeline will in general contribute to a greater dependence on fossil energy sources in Europe. In the short and medium term, the pipeline may – though this is extremely uncertain – be able to contribute to some reductions in emissions. However, it may also be able to contribute to increased energy consumption, and therefore to increased discharge of air pollution and climate gases. In the long term, the gas pipeline does not contribute to achieving the reduction target of 20 % set by the EU for gases which exert an influence on climate.

Increased energy efficiency and the increased use of renewable energy sources are better tools for achieving security of supply in the energy market in the EU than the investment in fossil fuels which is entailed in the laying of a new natural gas pipeline.

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The following have, in addition to Social Planning Director Ola Fischer (who made the decisions) and Jon Larsen (who prepared reports), taken part in this case: Johannes Elamzon, Strategy Department, Ann-Charlotte Linden, Planning and Housing Section, Ronny Andersson, Emergency Management Section and Lars Mohlin, Water and Fisheries Section.

Ola Fischer

(signed)

Jon Larsen

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