

Date
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Your date

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Consultation regarding supplementary documentation for Environmental Impact Assessment for Nord Stream Gas Pipeline

The company's adjustments to the route do not occasion the Swedish
Rescue Services Agency to add to its previous statement, which is
attached.

Department for Accident Prevention Operations

(signed) Ingemar

Anna
Nordlander

Malmström Dep.

Department

Manager

Appendix

Swedish Rescue Services Agency statement 26 January 2007

Date 26 Jan 2007
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Consultation under Espoo Convention and consultation under Ch. 6 Environmental Code for construction of natural gas pipeline and service platform in Baltic Sea

The SRSA has received documentation for consultation under the Espoo Convention from the SEPA. This consultation concerns Nord Stream AG's project to build a natural gas pipeline between Vyborg in Russia and Greifswald in Germany. The same consultation documents have also been received from Nord Stream AG in accordance with chapter 6 of the Environmental Code. Since the consultation documents are the same and concern the same project, the SRSA has chosen to process these cases together. This consultative statement therefore constitutes a reply to both referrals. The statement has been drawn up in consideration of the consequences for humans and the environment of accidents arising from activities during construction and operational phases, and of the need for preventative measures to reduce these accident risks. The legal consequences of the operation's being conducted in the Swedish EEZ instead of within Swedish territorial waters have not been analysed.

General opinions

In its consultation material, the company has stated that further studies will be done in various areas. The SRSA expects these forthcoming studies to be done, and does not, therefore, make any comments regarding what the company has already undertaken to do.

Choice of technology

According to the documents, the pipelines will be protected by means of a corrosion protection coating and a cathodic protection based on sacrificial anodes. Since active cathodic protection will not be used, it will be difficult to detect damage to the coatings, and hence minor leaks from the pipeline. The SRSA therefore wishes the company to describe the consequences of minor leaks of an order which would only be

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detected during pigging operations, i.e. after 2 – 5 years. In the first place, the company should calculate the volume of a minor, but long-term natural gas discharge and describe its consequences.

Choice of route

Since there is currently envisaged to be no landfall in Finland or Sweden, the company should also study a route on land south of the Baltic Sea, since this would fulfil the purpose of the project. The requirement to study and describe this alternative cannot be regarded as fulfilled merely because the company has described other projects using routes south of the Baltic Sea. The SRSA considers that a land pipeline would better allow maintenance work and would, in case of a leak, cause considerably less discharge, because leaks would be detected more quickly and it would be possible to install more shut-off valves.

Identified accident scenarios

According to the documentation, three accident scenarios have been identified which may cause gas leaks during the operation of the pipeline: damage from anchors, sinking vessels and contact with dumped munitions. The SRSA also wishes the coming EIA to describe more clearly the risks arising from the displacement of the pipeline, where it lies free on the sea bed, caused by trawling or vessels drifting at anchor.

The probability of an accident occurring to the pipeline has been calculated at once every 1,000 – 10,000 years. The SRSA does not consider this to be a negligible probability. The accident scenarios which have been identified should be described in more detail in the coming risk analysis, based on the consequences they could bring.

Measures to reduce probability and consequences

The company has described various safety zones which would be applied during construction and operation. These safety zones should be measured against the possibilities existing for regulating traffic in the Baltic Sea. In its risk analyses, the company should base its statements on safety zones that can actually be implemented.

The installation route would be cleared of dumped munitions. The SRSA wishes accident risks linked to clearing techniques to be described in more detail, and wishes it to be indicated where/in which country such munitions will be disposed of.

Service platform

The service platform should be able to burn off natural gas which has to be ventilated from the system. The burning off of natural gas reduces the greenhouse effect of methane gas twentyfold, which is desirable, as very large amounts of this gas can occur. It should be possible to carry out burning off in a controlled way, and it should also be possible in case of platform incidents when gas must be ventilated from the system.

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Preparedness

The SRSA wishes the company to give further description of what preparedness there would be for an accident, both during the construction and operation phases. As stated above, it is at present unclear to what extent, for example, the Protection Against Accidents Act (*lag om skydd mot olyckor*) will cover the installation. The company should therefore describe what technical and organisational preparedness will be provided for accidents brought about by the company's own operations.

For the pipeline, e.g. the possibilities and preparedness for sealing leaks during operation should be described. For the platform, preparedness for accidents in terms of rescuing people present on the platform should be described, as well as oil protection preparedness for spills and leaks from the platform or service vessels. Preparedness for sealing a major natural gas leak should also be described for the platform.

According to the documentation, preparedness plans are to be drawn up. It is important that these should be drawn up for both the installation and operation phases.

Department for Accident Prevention Operations

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